

COMMENTS AND RESPONSES
FOR
PUENTE HILLS LANDFILL
REVISED WASTE DISCHARGE REQUIREMENTS
FOR
WASTE DISPOSAL, ASSESSMENT MONITORING PROGRAM, AND
CORRECTIVE ACTION PROGRAM

Note: For responses resulting in modifications to the tentative Order, deletions are shown in strikeout, additions are shown in bold, and items that have been relocated to better organize the tentative Order are underlined. Factual or editorial corrections are included in the revised tentative requirements without further discussion herein.

COMMENTS FROM COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY:

WDR Comment No. 1, Item 64:

WDR Item 64 discusses the incinerator ash from the CREF and SERRF facilities that is currently disposed at the Landfill. The Sanitation Districts recommend that a clarifying statement be included that states that this incinerator ash is stabilized with cement prior to disposal at the Landfill.

Response:

The clarifying statement is appropriate and the tentative Order has been modified accordingly.

WDR Comment No. 2, Item 69:

WDR Item 69 makes reference to “construction stormwater permit No. 419S317018”. A Sanitation Districts contractor, LT Excavating, obtained this permit in 2001 as part of the Lower Western Cut Project. This project was completed and the permit should not be active. The Sanitation Districts recommend that the reference to this construction stormwater permit be removed.

Response:

Construction stormwater permit No. 419S317018 is no longer active and reference to it has been removed from the tentative Order.

WDR Comment No. 3, Item 83:

The Sanitation Districts recommend that WDR Item 83 be removed. As described in numerous submittals from the Sanitation Districts, background groundwater quality conditions at the site have been characterized using soil equilibrium studies and groundwater monitoring results from Canyon 9 and Eastern Canyons prior to landfilling operations. Because of the heterogeneous nature of the groundwater quality at the Landfill, no concurrent background groundwater monitoring would be representative of any single downgradient monitoring well. As a result, inter-well analysis is not possible at the Puente Hills Landfill. Based on the specific hydrogeologic characteristics at the Puente Hills Landfill, the Sanitation Districts recommend that groundwater monitoring at the Landfill not be subject to inter-well analysis or background data verification.

Response:

The tentative waste discharge requirements are templated on post-release monitoring and reporting requirements developed by State Board staff in the Land Disposal Unit. These requirements rely on intra-well statistical analysis to identify any landfill releases to groundwater. A component of the template requirements is to establish background water quality monitoring points for inter-well comparison to compliance monitoring wells for the purpose of validating intra-well water quality data used in the statistical evaluation. As discussed in Finding No. 60 of the tentative Order, the Discharger has previously attempted to characterize background groundwater quality at the Puente Hills Landfill. As summarized in the report “*Puente Hills Landfill – Eastern Canyons Groundwater Quality Detection Monitoring Program, February 1998*”, there is a wide range of background groundwater quality at the site, which is not uncommon for canyon landfills. The Discharger’s recommendation to eliminate template language referring to inter-well background water quality is consistent with historic monitoring at the Puente Hills Landfill, as approved by the Executive Officer, wherein inter-well background monitoring points have not been required. Regional Board staff agrees that including the template language in Finding No. 83 confuses the monitoring and reporting requirements of the Order, thus is deleted from the tentative Order.

WDR Comment No. 4, Item B.5(c):

Provision B.5(c) requires the Discharger to use a software program, MINITAB, to determine if the treated incinerator ash for the CREF and the SERRF may be hazardous using all available lead and cadmium test results. Other software programs exist which meet the USEPA SW-846 chapter 9 analysis requirements. The Sanitation Districts recommend that a clarifying statement be included in this provision that would allow the use of other software programs.

Response:

The clarifying statement “*or comparable software as approved by the Executive Officer*” does not diminish waste characterization requirements of provisions B.5.c, thus the suggested language is added to the tentative Order.

WDR Comment No. 5, Item G.1:

As stated in item G.1, water is applied to the site for irrigation and dust control purposes. The Sanitation Districts recommend that Item G.1 be modified to clarify other water uses are also permitted. Specifically, water is required for winter deck construction, road construction, and final cover construction to achieve desired compaction.

Response:

Usage of water for engineering purposes during landfill construction is an acceptable practice, thus, the tentative Order has been modified accordingly.

WDR Comment No. 6, Item G.3:

WDR Item G.3 states "Wastewater produced at the Landfill shall not be subject to WDRs, pursuant to provision G.1 above if it meets applicable requirements of the CWC, CCR, and HSC for recycled water." It is recommended that a provision be inserted that clarifies that the discharge of wastewater must comply with an NPDES permit issued in accordance with the federal Clean Water Act and CWC. In addition, G.3 states "The Discharger shall make an equivalence demonstration to the Executive Officer for each Landfill wastewater source proposed to be recycled at the Landfill." For clarification purposes, it is recommended that this provision be modified to "The Discharger shall demonstrate to the Executive Officer compliance with this provision before each Landfill wastewater source is used as an equivalent recycled water as defined above."

WDR Item G.3 should be clarified to acknowledge that requirements for recycled water currently utilized at the Landfill are also controlled by Water Reclamation Requirements for the San Jose Creek Water Reclamation Plant (Regional Board Order No. 97-072). Tertiary treated recycled water from San Jose Creek is used for landscape irrigation, dust control and cooling water at the Puente Hills Energy from Gas Facility.

Response:

Regional Board staff concurs that requirements in Section G of the tentative Order erroneously imply that the discharge of wastewater from the Puente Hills Landfill is acceptable, thus the Order is strengthened by a clarifying statement. For this reason the following provision has been added to the tentative Order:

No wastewater shall leave the Landfill except as permitted by an NPDES permit issued in accordance with the federal Clean Water Act (CWA) and CWC. The Discharger shall maintain and modify, as necessary, the NPDES Storm Water Pollution Prevention Plan developed for the Landfill.

This clarifying statement eliminates the need to reference screening levels for general NPDES permits (Provision G.8, including Attachment 2) which is being deleted from the tentative Order.

Regional Board staff also accepts the editorial rewrite of the portion of the provision that requires Executive Officer approval before each Puente Hills Landfill wastewater source is used as an equivalent recycled water.

Recycled water used at the Puente Hills Landfill that originates from the San Jose Creek Water Reclamation Plant is subject to reclamation requirements of Order No. 97-072 that controls usage practices for the recycled water. The tentative Order has been modified to clarifying that recycled water usage at the Puente Hills Landfill is subject to reclamation requirements of Order No. 97-072.

WDR Comment No. 7, Item G.4:

For consistency, it is recommended that WDR Item G.4 be clarified to remove the undefined terminology “for the purpose of reusing the wastewater”. Without this statement, the provision will clearly prohibit mixing of waters to achieve recycled water standards.

Response:

Regional Board staff accepts the editorial rewrite to clarify that mixing of waters to achieve recycled water standards for wastewater used at the Puente Hills Landfill is prohibited.

WDR Comment No. 8, Item G.8:

It is the Sanitation Districts understanding that Item G.3 already prohibits the discharge of wastewater from the site unless it meets applicable requirements of the CWC, CCR, and HSC for recycled water. Accordingly, Item G.8 appears to be redundant and should be deleted.

Response:

Regional Board staff concurs. See response to WDR Comment No. 6, Item G.3, above.

WDR Comment No. 9, Item G.9:

WDR Item 47 already states, “application of the tributary rule requires the beneficial uses of any specifically identified water body apply to its tributary streams”. Therefore, the inclusion of Item G.9 appears to be redundant. At minimum, the Sanitation Districts respectfully request the removal of language suggesting the Regional Board has performed a study of flow conditions, habitat values and beneficial uses of the surface waters within canyons/streams at the landfill.

Response:

Finding No. 47 introduces the concept of the Basin Plan tributary rule in the tentative Order and indicates that the rule will be applied to canyons/streams at the Puente Hills Landfill that are tributary to Main San Gabriel Hydrologic Subarea of the Los Angeles – San Gabriel Hydrologic Unit. Thus, Specification G.9 of the tentative Order is warranted

and is not being deleted. Upon further review of the tentative Order Regional Board staff believes that inclusion of this specification in the section regarding on-site use of water is awkward. In this context the language can be interpreted to suggest that the Regional Board has performed a study of flow conditions, habitat values and beneficial uses of the surface waters within canyons/streams at the Puente Hills Landfill. For these reasons the specification has been relocated to Section I (General Provisions) of the revised tentative Order and edited to reflect that the Regional Board is applying the beneficial uses for the Main San Gabriel Hydrologic Subarea of the Los Angeles – San Gabriel Hydrologic Unit for tributary canyons/streams.

M&RP Comment No. 1, Item 3:

In accordance with 23 CCR, division 3, section 3890, electronic reporting requirements are intended to replace requirements for the submittal of paper copies of reports beginning July 1, 2005. The Sanitation Districts recommend that the statement requiring documents larger than 8.5 inches by 11 inches be provided on paper to the Regional Board be removed. Oversized documents will be provided via Adobe Acrobat at an appropriate resolution for viewing and printing.

Response:

Regional Board staff recognizes that improved computer technology allows for efficient viewing and printing of oversized original documents. Staff concurs that the goal of electronic submittals is best served if entire documents are submitted in electronic format so that the request to eliminate the requirement to provide a hard copy of any page of a report that is larger than 8.5 inches by 11 inches is acceptable. The tentative M&RP has been modified accordingly.

M&RP Comment No. 2, Item 6:

The Sanitation Districts recommend that the immediate notification requirements for the identification of new COCs as a result of the Annual Appendix II leachate scan be removed. The identification of new COCs found within the containment system do not warrant the same level of importance as a detection of a COC at a monitoring well located downgradient of the Landfill. Moreover, comprehensive COC testing and the associated COC lists for Canyon 9 and the Eastern Canyons have been reported for many years. It is recommended that verified COCs continue to be prominently discussed in respective monitoring reports.

Response:

Annual leachate scans are utilized to refine the list of constituents of concern specific to the Puente Hills Landfill if constituents are confirmed in a follow-up semiannual scan. Regional Board staff concurs that the scans are part of routine monitoring activities which are not dissimilar to detection water quality monitoring results which will be reported on a semi-annual basis. The Discharger's request to eliminate immediate notification of leachate scan results does not diminish their ability to identify/respond to a release to

groundwater from the Puente Hills Landfill. The tentative M&RP has been modified to eliminate immediate notification of leachate scan results.

M&RP Comment No. 3, Item 7:

As described in numerous submittals from the Sanitation Districts, background groundwater quality conditions at the site have been characterized using soil equilibrium studies and groundwater monitoring results from Canyon 9 and Eastern Canyons prior to landfilling operations. Because of the heterogeneous nature of the groundwater quality at the Landfill, no concurrent background groundwater monitoring would be representative of any single downgradient monitoring well. As a result, inter-well analysis is not possible at the Puente Hills Landfill. Based on the specific hydrogeologic characteristics at the Puente Hills Landfill, the Sanitation Districts recommend that groundwater monitoring at the Landfill not be subject to (1) validating the intra-well background data sets (MRP Item 12), (2) the detection of man-made constituents in background wells (MRP Item 16), and (3) ongoing background well testing (MRP Item 17).

Response:

See also response to WDR Comment No. 3, Item 83, above. The tentative waste discharge requirements are templated on post-release monitoring and reporting requirements developed by State Board staff in the Land Disposal Unit. A component of the template requirements is to establish background water quality monitoring points for inter-well comparison for validation specific elements of the Puente Hills Landfill monitoring program. The Discharger has demonstrated to the satisfaction of Regional Board staff that identifying background water quality monitoring point(s) is prevented by the wide range of background groundwater quality at this canyon landfill. Implications for not being able to conduct ongoing background well testing at the Puente Hills Landfill include the inability to validate intra-well background data sets and to evaluate man-made constituents in background wells.

There is not requirement to establish new background monitoring points in the proposed tentative Order. This point is clarified through an expanded discussion of water quality monitoring at the Puente Hills Landfill as requested by the Discharger. Requirements for background water quality monitoring at the Puente Hills Landfill have not been deleted from the tentative Order because Regional Board staff believes the tentative Order that includes contingency language that background water quality monitoring may not be achievable. For example, requirements in Item No. 12.b.i.B of the tentative M&RP regarding man-made constituents in background wells indicate that “... *any background well rejected pursuant to this item, for a given MPar, if the Discharger has not already explained the constituent’s presence at that well to the satisfaction of the Executive Officer, the Discharger shall ...*”. In effect, Regional Board staff accepts that background monitoring points have previously been rejected.

M&RP Comment No. 4, Item 10:

As described in the response to MRP Item 6, the Sanitation Districts recommend that the immediate notification requirements for the identification of new COCs as a result of the Annual Appendix II leachate scan be removed. The identification of new COCs found within the containment system do not warrant the same level of importance as a detection of a COC in a monitoring well located downgradient of the Landfill. Moreover, comprehensive COC testing and the associated COC lists for Canyon 9 and the Eastern Canyons have been reported for many years. It is recommended that verified COCs continue to be prominently discussed in respective monitoring reports.

Response:

See response to M&RP Comment No. 2, Item 6, above.

M&RP Comment No. 5, Item 11:

MRP Item 11 states that “the Discharger shall implement a federal AMP for the Landfill within 90 days of the adoption of Order No. R4 2005 XXXX and perform the following monitoring and analysis requirements.” The Sanitation Districts recommend that this statement be modified to reflect that the Discharger has completed an Evaluation Monitoring Program (EMP) for the site and is currently complying with an existing Corrective Action Program (WDR Order No. 99-059) for the Landfill.

The Sanitation Districts also propose to modify the notification requirement in MRP Item 11(b)(ii). After the detection and validation of a new COC at a monitoring well, it is recommended that the Discharger immediately notify the Regional Board via phone followed by a formal notification within fourteen days of a verification.

Response:

The modifications suggested by the Discharger more accurately reflect findings in the Order that an evaluation monitoring program, engineering feasibility study, and corrective action program have been completed, and or on-going in response to known releases to groundwater from the Main Canyon area of the Puente Hills Landfill. The comments are accepted and the tentative M&RP has been modified accordingly.

The detection of a constituent of concern at a monitoring well elevates the potential that the constituent can be a component of a release to groundwater from the Puente Hills Landfill. Thus, in addition to a thorough discussion of the detection in the commensurate semi-annual monitoring approach, verbal notification to alert Regional Board staff is warranted, as is a formal submittal which can be included in the Discharger’s operating record and the Regional Boards correspondence file. Review of the notification requirements for monitoring results with the potential to become a component of a release to groundwater from the Puente Hills Landfill indicates that these requirements are not completely consistent in the tentative Order. Item 11 has been revised to incorporate consistent notification requirements that include verbal notice, follow-up correspondence, and a thorough discussion in the corresponding semi-annual report.

M&RP Comment No. 6, Item 12(a):

The Sanitation Districts recommend that the reference to “Monitoring Limit” be replaced with “Minimum Level”. For reporting monitoring results, the Sanitation Districts propose to use Minimum Levels (MLs) and Reporting Limits (RLs) in place of method detection (MDL) and practical quantitation limit (PQL). The method detection limit does not provide meaningful information regarding the actual presence of contaminants. On October 2, 2002, the State Water Resources Control Board (SWRCB) issued the policy for the Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California (State Implementation Plan). The State Implementation Plan requires the development and the use of minimum levels (MLs) when reporting water quality data. The ML represents the lowest quantifiable concentration in a sample based upon the proper application of analytic procedure and the absence of matrix interference. MLs also represent the lowest standard concentration on the calibration curve for a specific analytical technique after the application of appropriate method-specific factors. Accordingly, the Sanitation Districts also request that any reference to detections at or above a trace level should be removed from the MRP.

Response:

The incorrect technical term “monitoring limit” is being replaced with the correct term Minimum Level as defined in Attachment 1.

Since 2002, the Discharger has implemented a monitoring approach for evaluating trace level detections for the Puente Hills Landfill that are consistent with the State Implementation Plan. The tentative waste discharge requirements, templated on post-release monitoring and reporting requirements developed by State Board staff in the Land Disposal Unit adopt USEPA statistical methods that rely on Method Detection Limits and Practical Quantitation Limit methods (as defined in Attachment 1) for evaluating trace level detections. The purpose of Item 12(a) of the tentative M&RP is to reconcile the monitoring approach to evaluate trace level detections. To further clarify this monitoring approach the suggested language regarding the State Implementation Plan policies is accepted and the tentative M&RP has been modified accordingly.

M&RP Comment No. 7, Item 12(b):

MRP Item 12(b) discusses the intra-well comparison method that will be conducted for the monitoring parameters. The Sanitation Districts recommend that a clarifying statement be include which identifies which monitoring parameters are subject to the intra-well comparison method. The monitoring parameters for each compliance well that are subject to the routine analysis are indicated in Table 3.

Response:

The straightforward clarification statement submitted by the Discharge is acceptable. The tentative M&RP has been modified accordingly.

M&RP Comment No. 8, Item 12(d):

The Basin Plan water quality objectives for groundwater are not applicable for the naturally poor water quality at the Puente Hills Landfill. The Sanitation Districts propose to modify this statement such that the WQPSs for the Landfill are established as the natural background groundwater quality at the site, which are set to either the statistically predicted value or historical site background data (if the constituent naturally exists) or the minimum level (if the constituent does not naturally exist in the water).

Response:

The water quality protection standards for the Puente Hills Landfill are established in Item No. 19 of the M&RP as the natural background groundwater quality at the site. Regional Board staff agrees that discussion of water quality objectives established in the Basin Plan for groundwater in the Main San Gabriel River Basin in this portion of the M&RP is confusing. Discussion of these water quality objectives have been relocated to a more appropriate portion of the tentative Order, Finding No 46.

M&RP Comment No. 9, Item 12(e):

Due to the potential for numerous retests to be triggered from the revised WDR/MRP, it is recommended to modify these provisions to limit the absolute need for retesting. Conceptually, the discharger should be able to elect to either acknowledge the validity of laboratory results or retest to verify the result.

Response:

Allowing the Discharger to accept initial test results without requiring confirmatory retesting improves the Discharger's ability to respond to the initial result. Because the proposed modifications allows for an enhanced response, thus strengthens the monitoring and reporting program, the proposed revision is accepted and the tentative M&RP has been modified accordingly.

M&RP Comment No. 10, Item 12(f):

The Sanitation Districts believe that a qualifying statement should be included that allows the discharger to demonstrate, in accordance with 27 CCR Section 20420(k)(7), that a source other than the Landfill caused an MPar to produce a measurably significant increase at a given well or that the evidence is an artifact caused by an error in sampling, analysis, or statistical evaluation, or by natural variation in the groundwater. Changes in water quality that produce a measurably significant increase at a given well and result in placing that well/MPar pair from Detection Mode to Tracking Mode may occur even though the increase is not a result of a landfill release. This is especially true for naturally occurring constituents whose groundwater quality composition may change as a result of several natural groundwater processes. These

processes can include: (1) the progressive natural dissolution of aquifer materials as the groundwater flows from an upgradient to downgradient location, (2) the infiltration of vadose water from rain water mixing with groundwater, and (3) the cutoff of groundwater recharge that results from the installation and operation of containment systems.

Response:

The proposed clarifying statement is consistent with requirements of Section 20420(k)(7) of title 27 of the California code of Regulations that allows investigation of a source other than the Puente Hills Landfill in response to a measurably significant increase at a given monitoring well. The tentative M&RP has been modified accordingly.

M&RP Comment No. 11, Item 13:

As recommended for MRP Item 11(b)(ii) above, after the detection and validation of a new COC at a monitoring well, the Sanitation Districts propose to modify the notification requirements such that they immediately notify the Regional Board via phone followed by a formal notification within fourteen days of a verification.

Response:

See response to M&RP Comment No. 5, Item 11 above.

M&RP Comment No. 12, Item 14:

For any COC that does not have the minimum sample size required at a given compliance well, the Sanitation Districts propose to obtain eight additional samples quarterly rather than ten samples monthly. To establish an initial database for statistical analysis, 27 CCR, Section 20415(e)(6) requires a minimum of four data points collected on a quarterly basis. The Sanitation Districts believe that a minimum of two years is required to account for seasonal variations in water quality. The ten monthly samples specified in the tentative MRP do not provide sufficient time to reflect seasonal variations, and therefore would not be representative. The Sanitation Districts recommend this provision be modified to require the collection of eight quarterly samples in order to establish a meaningful initial database.

Response:

As indicated in the M&RP Item 12.b.i.A, the purpose of acquiring ten monthly samples is for accelerated background data procurement in order to implement evaluation methods as quickly as possible. Regional Board staff acknowledges that initially there may not be a statistically legitimate background data set but also recognizes the advantage of initiating the statistical methodology as soon as possible to begin evaluating any environmental risk from the constituent of concern in question. The recommendation as submitted is not accepted.

M&RP Comment No. 13, Item 15(b):

As discussed in response to WDR Item 69 above, construction stormwater permit No. 419S317018 was obtained in 2001 as part of the Lower Western Cut Project. This project was completed and the permit should not be active. The Sanitation Districts recommend that the reference to this construction stormwater permit be removed.

Response:

See response to WDR Comment No. 2, Item 69, above. Construction stormwater permit No. 419S317018 is no longer active and reference to it has been removed from the tentative Order.

M&RP Comment No. 14, Item 18:

The Sanitation Districts recommend that explanations for changes in MDLs and PQLs be “approved by” rather than “written and signed by” the owner/director of the analytical laboratory. These signatures may not be compatible with electronic reporting to GeoTracker.

Response:

“Approved by” rather than “written and signed by” is largely semantic given that the certification statement for all monitoring reports required in Item No. H.13 of the tentative Order includes the attached laboratory data. The recommendation is accepted and the tentative M&RP has been modified accordingly.

M&RP Comment No. 15, Item 19 (c):

The Sanitation Districts disagree with statement that there are no POC monitoring wells at the Landfill. All existing downgradient groundwater monitoring wells included in MRP Item 7 are designated Points of Compliance as described in previous WDRs and MRPs for the Puente Hills Landfill. These monitoring wells make up the groundwater monitoring network that can adequately ascertain if there is any impact to groundwater quality as a result of the operation of this waste management facility.

Response:

As described in Attachment 1, a Point of Compliance monitoring well for the purposes of the tentative Order is “for the ground water medium, a part of the landfill’s Water Quality Protection Standard and means a conceptual vertical surface that is located, in map view, along the hydraulically downgradient limit of waste placement at the landfill and that extends downward through the uppermost aquifer underlying the Unit”. The existing compliance monitoring wells are not located, in map view, along the hydraulically downgradient limit of waste placement, thus, by this strict definition are not Point of Compliance monitoring wells.

The tentative waste discharge requirements, templated on post-release monitoring and reporting requirements developed by State Board staff in the Land Disposal Unit, include

reference to “*Point of Compliance*”. However, Item 19 (c) reflects the long standing monitoring approach at the Puente Hills Landfill, as approved by the Executive Officer, wherein compliance monitoring points are downgradient of a series of subsurface cutoff walls that are downgradient of the corresponding Point of Compliance. Acceptance of this monitoring approach is clarified by the statement in Item 19 (c) that “*for the purposes of this M&RP POC monitoring points shall consist of the current compliance monitoring wells listed Item No. 7.*” However, the final sentence of Item 19 (c) (*The POC monitoring points may change with time to existing wells closer to the POC*) implies uncertainty with this monitoring approach. There is no intent to revise the compliance point monitoring approach at this time so that this statement is being deleted.

M&RP Comment No. 16, Item 20:

The Sanitation Districts recommend that the laboratory reports be “approved” rather than “signed” by director of the laboratory. In accordance with 23 CCR, division 3, section 3890, electronic reporting requirements are intended to replace requirements for the submittal of paper copies of reports beginning July 1, 2005. At this time, GeoTracker does not have the ability to accept signed laboratory reports.

Response:

See response to M&RP Comment No. 14, Item 18, above. The recommendation is accepted and the tentative M&RP has been modified accordingly.

M&RP Comment No. 17, Item 20 (d):

For quality assurance/quality control data, the Sanitation Districts propose to provide an explanation of any QA/QC measure that is outside the laboratory control limits. The existing language states that an explanation is required of any recovery rate that is less than 80 percent. Based on the chemical properties of a constituent, recovery rates will vary and certain compounds will not achieve 80 percent.

Response:

Regional Board staff is not opposed to alternative methodologies that provide equivalent information. The recommendation is acceptable and the tentative M&RP has been modified accordingly

M&RP Comment No. 18, Item 20 (f):

The Sanitation Districts propose to submit a technical report for an analytical methodology to report unknown chromatographic peaks. The Sanitation Districts’ laboratory is currently unable to identify and quantify unknown peaks. However, we are in the process of implementing a Laboratory Information Management System (LIMS) that will be used for data handling and management functions of the laboratory. The LIMS will permit identification of unknown peaks in GC/MS chromatograms.

Response:

Regional Board staff is not opposed to alternatives methodologies that provide equivalent information. The recommendation is acceptable and the tentative M&RP has been modified accordingly

M&RP Comment No. 19, Item 20 (h):

The Sanitation Districts recommend that the definition of MDL be removed from the MRP. As discussed in MRP Item 12(a), the Sanitation Districts propose to use MLs and RLs in place of MDLs and PQLs. MDLs and PQLs do not provide meaningful information regarding the actual presence of contaminants. Instead, MLs represent the lowest quantifiable concentration in a sample based upon the proper application of analytic procedure and the absence of matrix interference. MLs also represent the lowest standard concentration on the calibration curve for a specific analytical technique after the application of appropriate method-specific factors.

Response:

The definition of MDL is included in Attachment 1 which is part of the tentative Order. Regional Board staff concurs that its inclusion in M&RP Item 20(h) is repetitive. The recommendation is accepted and the tentative M&RP has been modified accordingly.

M&RP Comment No. 20, Item 23:

For metals analysis, the Sanitation Districts propose to test for total metals with the option to also obtain filtered metals representative of the dissolved phase. Micropurge groundwater sampling procedures have eliminated much of the discrepancy between filtered and unfiltered data. Moreover, other landfills are not required to obtain both filtered and unfiltered samples. In the past, the Sanitation Districts have volunteered to obtain filtered data in order to demonstrate particulates within a groundwater sample can bias results.

Response:

In effect, micropurge sampling techniques eliminate the need to filter samples because suspended sediments are not incorporated into the sample. Because analysis of nonfiltered samples is a more conservative approach than that of for filtering samples, Regional Board staff accepts the recommendation and the tentative M&RP has been modified accordingly.

M&RP Comment No. 21, Item 28:

The Sanitation Districts request the testing frequency of treated incinerator ash be modified to reflect current quarterly monitoring requirements as specified in the existing MRP. Based upon consistent treatment results, the Regional Board previously reduced the sampling frequency from every 2,000 tons to quarterly. Also, note that ash was analyzed for dioxin every 20,000 tons from September 1991 through April 1993 and no

dioxin was detected. In response, the Regional Board removed this parameter from the MRP. The proposed increase in testing frequency is burdensome and unnecessary. The Sanitation Districts recommend that the existing sampling frequency and parameters be maintained in the proposed MRP.

Response:

The requested testing frequency reflects modifications to the monitoring requirements in Order No. 91-035 included in Order No 93-070 and previously accepted by Regional Board staff and/or the Executive Officer. The testing frequency has been revised to reflect current monitoring practice with the recognition that additional comments regarding ash waste disposal at the Puente Hills Landfill are forthcoming prior to the Regional Board's public meeting wherein the Puente Hills Landfill waste discharge requires will be heard.

M&RP Comment No. 22, Item 29:

The Sanitation Districts propose to use ASTM procedure C172-99 for collected incinerator ash samples for analysis. The existing MRP allows the ash samples to be collected either by collecting 4-hour composite samples or by using the ASTM Standard Procedure 172-85 (now updated to 172-99).

Response:

The requested testing frequency reflects modifications to the monitoring requirements in Order No. 91-035 included in Order No 93-070 and previously accepted by Regional Board staff and/or the Executive Officer. The testing frequency has been revised to reflect current monitoring practice with the recognition that additional comments regarding ash waste disposal at the Puente Hills Landfill are forthcoming prior to the Regional Board's public meeting wherein the Puente Hills Landfill waste discharge requirements will be heard.

M&RP Comment No. 23, Item 32:

The Sanitation Districts propose to determine the total depth of each compliance well annually during the fourth quarter. The depth to bottom for each monitoring well can be obtained when a groundwater sample is collected.

Response:

The intent of the M&RP is to assess the working condition of monitoring wells on an annual basis by checking for any sedimentation into each monitoring well. The monitoring date is not critical so that coordination with a water quality collection event is prudent. The recommendation is accepted and the tentative M&RP has been modified accordingly.

M&RP Comment No. 24, Item 35:

The Sanitation Districts propose to include data collected monthly in the semi-annual reports. The MRPs for other landfills including City of Burbank, Simi Valley, Sunshine Canyon, and Lopez Canyon require this information on a semi-annual basis.

Response:

The Discharger is correct in arguing that there is a precedent for the submittal of waste disposal information in corresponding semi-annual monitoring reports for other landfills in the Region. The request is accepted and the tentative M&RP has been modified accordingly.

M&RP Comment No. 25, Item 36:

The Sanitation Districts propose to generate monthly maps of the disposal areas and to include these monthly maps in the semi-annual reports. As stated above, regarding MRP Item 35, semi-annual reporting requirements are consistent with MRPs for other landfills.

Response:

See response to M&RP Comment No. 24, Item 35, above. The request is accepted and the tentative M&RP has been modified accordingly.

M&RP Comment No. 26, Item 37(b):

For dewatered sewage sludge analysis, the Sanitation Districts propose to analyze two digested, dewatered samples. One sample will be analyzed quarterly for soluble metals following the citrate Waste Extraction Test (WET) procedure. The second sample will be analyzed semi-annually for the following parameters: polychlorinated biphenyls (PCBs), trichloroethylene (TCE), perchloroethylene (PCE), carbon tetrachloride, DDT DDE, DDD, Endrin, Lindane, Methoxychlor, Toxaphene, 2,4-D and 2,4,5-TP (Silvex). This proposal is consistent with the existing MRP for the Puente Hills Landfill.

Response:

Quarterly testing of dewatered sewage sludge for soluble metals, polychlorinated biphenyls, trichloroethylene, perchloroethylene, carbon tetrachloride, DDT DDE, DDD, endrin, lindane, methoxychlor, toxaphene, 2,4-D and 2,4,5-TP (Silvex) is not an overly aggressive characterization of the sewage sludge waste. Board staff does not accept the recommendation for semi-annual versus quarterly testing of dewatered sewage sludge for polychlorinated biphenyls, trichloroethylene, perchloroethylene, carbon tetrachloride, DDT DDE, DDD, endrin, lindane, methoxychlor, toxaphene, 2,4-D and 2,4,5-TP.

M&RP Comment No. 27, Item 38:

The Sanitation Districts propose to include monthly treated incinerator ash disposal area maps and to include these monthly maps in semi-annual reports. As discussed above, semi-annual reporting requirements are consistent with MRPs for other landfills.

Response:

See response to M&RP Comment No. 24, Item 35, above. The request is accepted and the tentative M&RP has been modified accordingly.

M&RP Comment No. 28, Item 41:

The Sanitation Districts propose to include the COC report in the semi-annual report. Because of the amount of time required to collect samples, analyze the samples, obtain verified results from laboratories and prepare semi-annual reports, the Sanitation District request that the reporting dates for semi-annual reports be extended by one month. In addition, the Sanitation Districts would like to have the option, like other dischargers, to submit a combined semi-annual/annual report.

Response:

Regional Board staff does not oppose efficiencies brought about by combining reports if no required information is omitted. The Discharger is correct that there is a precedent for other dischargers in the Region to combine the annual report with a corresponding semi-annual monitoring report. Thus, it is acceptable to also combine the constituent of concern report with a semi-annual monitoring report. These requests are accepted and the tentative M&RP has been modified accordingly.

The long-standing standard reporting time for monitoring reports is 45 days after the last day of the sampling period. By this standard there is a maximum of about 75 days from the start of sampling to reporting of results. Regional Board staff does not accept revising this long-standing standard for reporting results at this time.

M&RP Comment No. 29, Item 42(b)(iii):

The Sanitation Districts propose to include the type of containers and preservatives used during the collection of samples in laboratory reports. The Sanitation Districts do not believe this information should be included in the text of the semi-annual monitoring report. For a typical sample, numerous containers are used to collect samples to preserve specific constituents. Also, chemical preservatives vary depending on the constituents to be analyzed.

Response:

Regional Board staff concurs that the laboratory reports are adequate for reporting such routine information as type of containers and preservatives used and that this routine information need not be summarized in semi-annual reports. The proposal is accepted and the tentative M&RP has been modified accordingly.

M&RP Comment No. 30, Item 42(c):

The Sanitation Districts request that requirements for reporting data via hard copies or CD ROMs be removed. As described above, in accordance with 23 CCR, division 3, section 3890, electronic reporting requirements are intended to replace requirements for the submittal of hard copy reports beginning July 1, 2005.

Response:

Regional Board staff concurs that the requirement to submit hard copies or electronic copies on CD ROMs is superceded by recently adopted electronic reporting requirements contained in 23 CCR, division 3, section 3890. The request is accepted in order to eliminate conflict with electronic reporting requirements and the tentative M&RP has been modified accordingly.

M&RP Comment No. 31, Table 1:

To simplify the MRP, Table 1 could be removed. The Sanitation Districts have been reporting COC lists in quarterly reports. A requirement to update the existing COC lists could instead be included in the MRP.

Response:

Pursuant to the M&RP requirements, the status of individual monitoring parameters (MPars) at each monitoring well must be tracked over time. While unwieldy, summarizing the information in a table is effective. The Discharger has not provided an acceptable alternative method. The recommendation is not accepted.

M&RP Comment No. 32, Table 2:

Table 2 should also include piezometer "PBX-16".

Response:

The correction is acknowledged and the tentative M&RP has been modified accordingly.

M&RP Comment No. 33, Table 3:

The Sanitation Districts recommend that the following constituents be removed from Table 3: electrical conductivity, total organic halogen (TOX), nitrite, cyanide and sulfide. Several of these parameters are redundant. Electrical conductivity provides the same information as total dissolved solids (TDS) because TDS is directly proportional to conductivity. Total organic halogen is a gross measure of chlorinated compounds. Chlorinated hydrocarbons commonly associated with landfills are already monitored separately by analyzing the Appendix I VOCs.

The Sanitation Districts do not believe that nitrite nitrogen will provide an indication of a release from the landfill. The primary source of all nitrates is atmospheric nitrogen gas.

From the atmosphere, gas is converted to organic nitrogen by some plant species by a process called nitrogen fixation. Organic nitrogen is decomposed by microorganisms to inorganic ammonium salts (ammonification). These in turn are converted to nitrates by a process called nitrification. The intermediate product - nitrite - is generally short lived and seldom accumulates in significant quantities in any natural environment.

The most common nitrogen contaminant identified in groundwater is dissolved nitrogen in the form of nitrate. Common sources of nitrate nitrogen include agriculture activities (fertilizers), the disposal of sewage, and from plant residue (as discussed above). In groundwater that is strongly oxidizing, nitrate nitrogen is the stable form of dissolved nitrogen. In an anaerobic environment, such as a landfill, the nitrate nitrogen is converted to N_2O and then nitrogen gas. Because nitrite has not been associated with landfills and monitoring for nitrite is not required for the majority of other landfills (City of Burbank, Simi Valley, Sunshine Canyon, Lopez Canyon, etc.), we recommend that nitrite be removed from MRP Table 3. However, we are not opposed to LCRS monitoring and 5-Year COC Scans for this constituent.

Regarding cyanide and sulfide, historical monitoring results from LCRSs indicate that these compounds are detected randomly and at low concentrations. Similar random detections have also been observed in the existing downgradient and background monitoring wells. In fact the only downgradient wells to detect sulfide those that have not been impacted any VOCs (M11A, EMP3, EMP4, EMP6, M51A, and M52B). Similarly, cyanide was primarily detected at wells not impacted by the landfill (M41A, M43A, EMP4, M51A and M52B), except for M31A and M04A. Moreover, downgradient cyanide detections were all within historical background levels. Based upon this information, we do not believe that either cyanide or sulfide are useful indicators of a potential release from the landfill. Accordingly, we would recommend that these parameters be removed from MRP Table 3. However, we again are not opposed to continued LCRS monitoring and 5-Year COC Scans for cyanide and sulfide.

Response:

The tentative waste discharge requirements are templated on post-release monitoring and reporting requirements developed by State Board staff in the Land Disposal Unit. Pursuant to M&RP requirements, the status of individual monitoring parameters (MPars) at each monitoring well will be evaluated through intra-well statistical analysis to identify any landfill releases to groundwater. Inherent in this monitoring approach is an evolution from more routine data collection and reporting of a large number of parameters to a more thorough analysis of the parameters with the highest potential for providing the earliest indication of a contamination release to groundwater. The analysis provide in the Discharger's email correspondence of October 6, 2005 (attached) is an example of the on-going evaluation to continuously refine the monitoring program for the Puente Hills Landfill.

Regional Board staff concurs that electrical conductivity provides similar information total dissolved solids. Nonetheless, electrical conductivity results are easily collected in the field or laboratory and are an inexpensive confirmation of salinity levels in

groundwater samples. Regional Board staff does not accept the recommendation that electrical conductivity not be included as monitoring parameters for compliance monitoring wells at this time.

Regional Board staff concurs that total organic halides (TOX) results serve as a screening test for halogenated compounds (such as chlorinated organic solvents, pesticides, and PCBs) rather than a specific result for any one halogenated hydrocarbon compound. While chlorinated hydrocarbons commonly associated with landfills are monitored separately by analyzing the Appendix I volatile organic compounds this is not an exhaustive analysis of all compounds that may be represented in a TOX analysis. Regional Board staff does not accept the recommendation that TOX not be included as monitoring parameters for compliance monitoring wells at this time.

Research completed by the USEPA on landfills as bioreactors indicates that nitrites can occur in landfill leachate. Given the disposal history of sewage sludge at the Puente Hills Landfill, evaluation of nitrite as a constituent that may provide any early indication of a contamination release is not unwarranted and that nitrite is not required for other landfills within the Region is less relevant. Barring further information, Regional Board staff does not accept the recommendation that nitrite not be included as monitoring parameters for compliance monitoring wells at this time.

Regional Board staff concurs that historical monitoring results for cyanide and sulfide in leachate samples indicate random and low concentrations (see analysis provided in attached email correspondence of October 6, 2005). Regional Board staff accepts the recommendation that these constituents not be included as monitoring parameters for compliance monitoring wells at this time but continue to be monitored for in leachate for inclusion in future scans of constituents of concern.

M&RP Comment No. 34, Table 4:

To simplify the MRP, the Sanitation Districts recommend that Table 4 be removed. MRP Item 10 already specifies the COCs to be analyzed.

Response:

A general description of constituents of concern is included in Item No. 10 of the M&RP. However, the constituents vary for unlined versus lined portions of the Puente Hills Landfill and different constituents can be added over time pursuant to M&RP requirements. The status of individual constituents of concern at each monitoring well must be tracked over time. While unwieldy, summarizing the information in a table is effective. The Discharger has not provided an acceptable alternative method. The recommendation is not accepted.

From: "Rothbart, David" <DRothbart@lacsds.org>{PRIVATE }
To: "Enrique Casas (E-mail)" <ecasas@waterboards.ca.gov>
Date: 10/6/2005 3:27:47 PM
Subject: Puente Hills - WDR/MRP Comments - Re: Cyanide, Sulfide and Nitrite

Enrique,

The attached spreadsheet highlights total cyanide and sulfide detections in the Canyon 9 and Eastern Canyons LCRSs. As illustrated, these detections generally occur randomly and at low concentrations. Similar random detections have also been observed in the existing downgradient monitoring wells as well as in background monitoring wells (see attached pdf file). It's interesting that the downgradient monitoring wells that have detected sulfide have not been impacted any VOCs (M11A, EMP3, EMP4, EMP6, M51A, and M52B). Similarly, cyanide was primarily detected at wells not impacted by the landfill (M41A, M43A, EMP4, M51A and M52B), except for M31A and M04A. The downgradient cyanide detections were all within background levels summarized in Table 6-1 (see pdf file). Based upon this information, we do not believe that either cyanide or sulfide are useful indicators of a potential release from the landfill. Accordingly, we would appreciate if these parameters could be removed from MRP Table 3. However, we are not opposed to continued LCRS monitoring and 5-Year COC Scans for cyanide and sulfide.

Although we do not currently monitor for nitrite nitrogen, we do not believe that it would provide an indication of a release from a landfill. The primary source of all nitrates is atmospheric nitrogen gas. From the atmosphere, the gas is converted to organic nitrogen by some plant species by a process called nitrogen fixation. Organic nitrogen is decomposed by microorganisms to inorganic ammonium salts (ammonification). These in turn are converted to nitrates by a process called nitrification. The intermediate product - nitrite - is generally short lived and seldom accumulates in significant quantities in any natural environment.

The most common nitrogen contaminant identified in groundwater is dissolved nitrogen in the form of nitrate. Common sources of nitrate nitrogen include agriculture activities (fertilizers), the disposal of sewage, and from plant residue (as discussed above). In groundwater that is strongly oxidizing, nitrate nitrogen is the stable form of dissolved nitrogen. In an anaerobic environment, such as a landfill, the nitrate nitrogen is converted to N₂O and then nitrogen gas.

Because nitrite has not been associated with landfills and monitoring for nitrite is not required for the majority of other landfills (City of Burbank, Simi Valley, Sunshine Canyon, Lopez Canyon, etc.), we would appreciate if nitrite could be removed from MRP Table 3. However, again we are not opposed to LCRS monitoring and 5-Year COC Scans for this constituent.

Please let me know if you need any additional information regarding these compounds. Again, we believe that sulfide, cyanide and nitrite will not provide useful information as MPars at the Puente Hills Landfill. Thanks for listening to our concerns!

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David

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<<sulfide & cyanide in LCRSs.xls>> <<PHLF CN & Sulfide.pdf>>

CC: "Rod Nelson (E-mail)" <RNELSON@waterboards.ca.gov>,
"Asgian, Robert" <RAsgian@lacsds.org>, "Herbeck, Chris"
<CHerbeck@lacsds.org>

EXHIBIT 1
TOTAL CYANIDE AT THE CANYON 9 LCRS AND THE EASTERN CANYONS LCRS
PUENTE HILLS LANDFILL

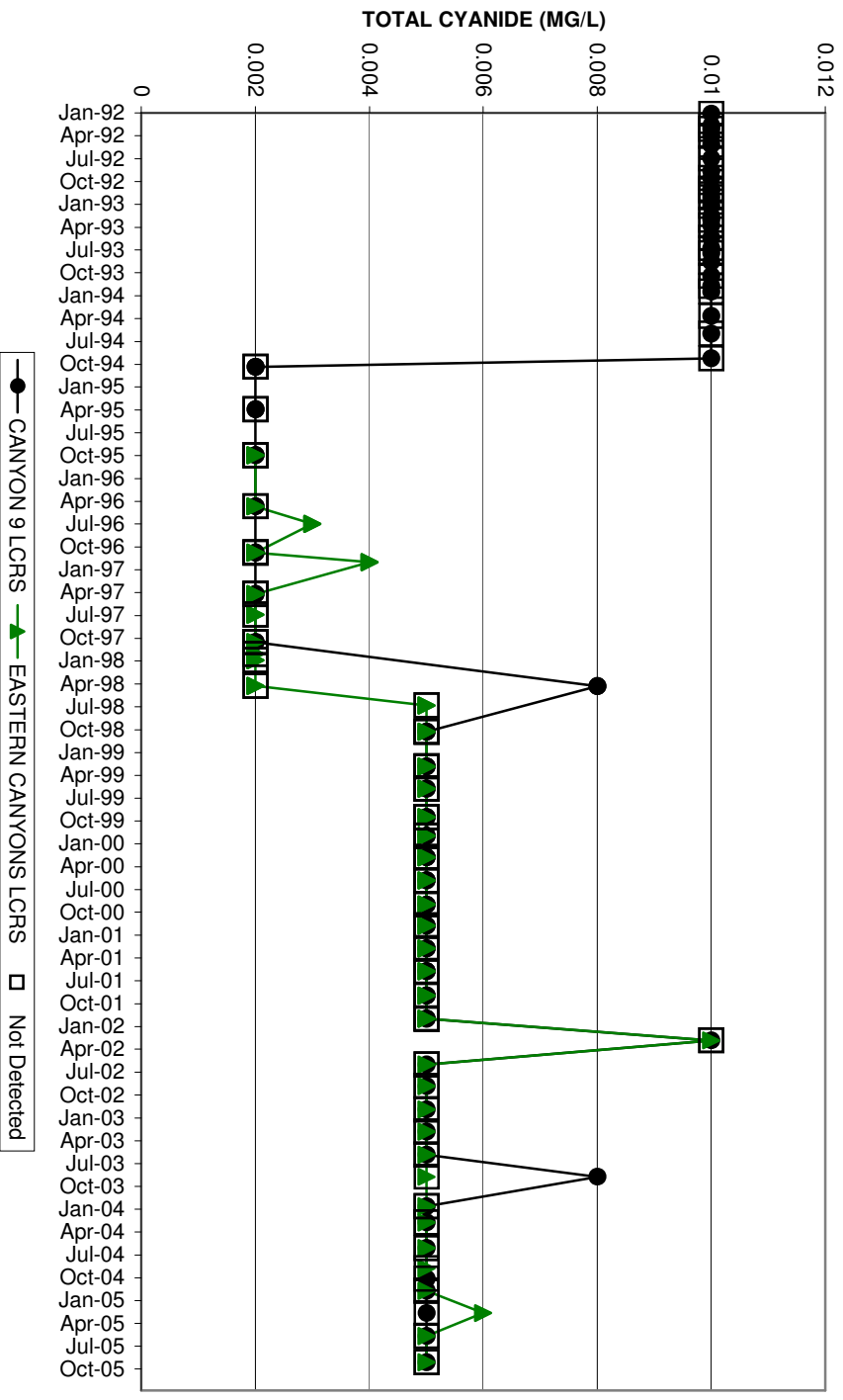


EXHIBIT 2
TOTAL SULFIDE AT THE CANYON 9 LCRS AND THE EASTERN CANYONS LCRS
PUENTE HILLS LANDFILL

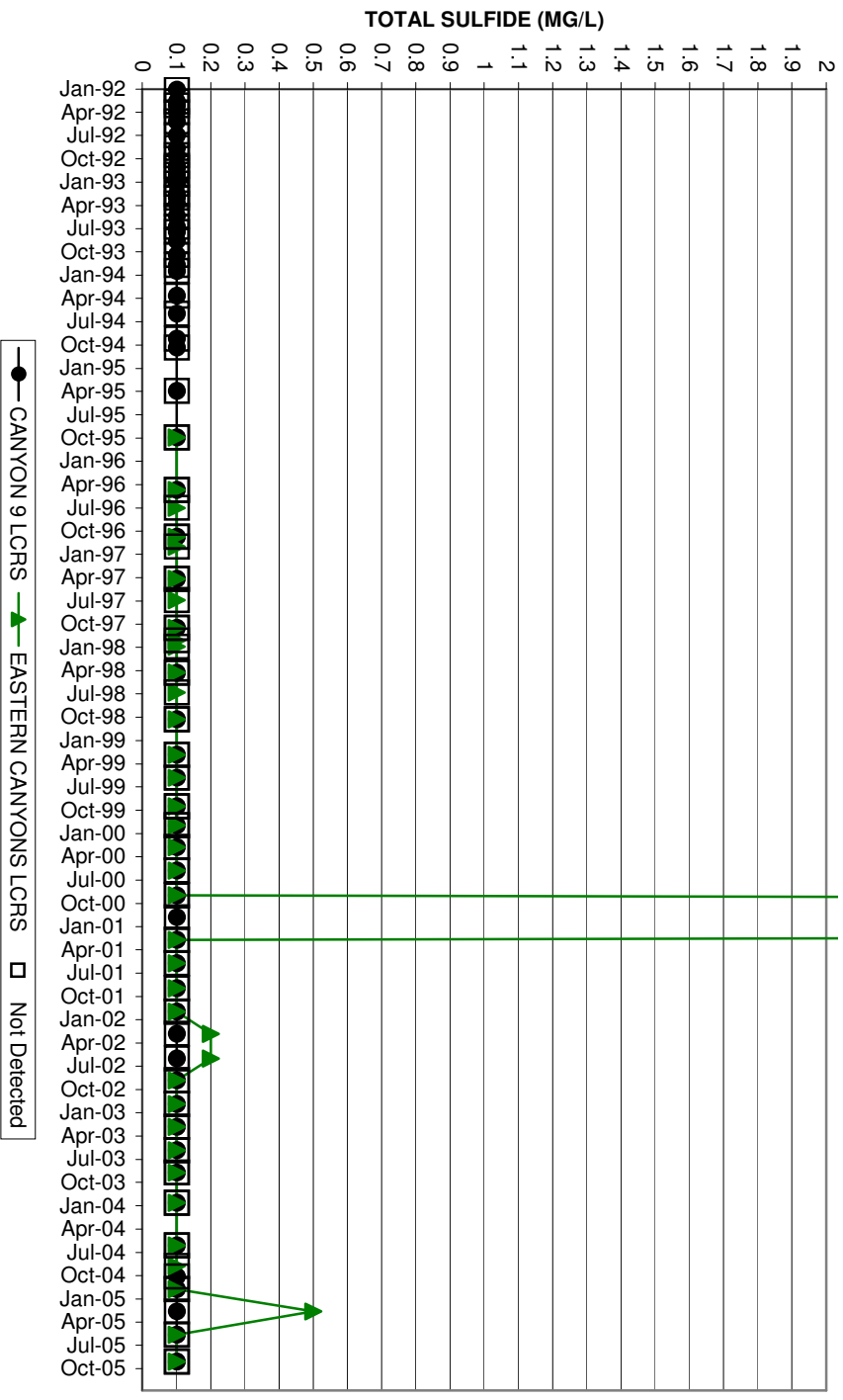


TABLE 6-1
 PUENTE HILLS LANDFILL EASTERN CANYONS
 BACKGROUND WATER QUALITY - FIELD DATA

CONSTITUENTS		ALLUVIUM/ WEATHERED BEDROCK WELLS (1)	REPETTO SILTSTONE (Tie) WELLS (2)	REPETTO CONGLOMERATE (Tie1 and Tie2) WELLS (3)	SYCAMORE CANYON CLAYSTONE/ SILTSTONE (Tie) WELLS (4)	SYCAMORE CANYON CONGLOMERATE (Tie1 and Tie2) WELLS (5)	OVERALL RANGE FOR BACKGROUND WELLS
General							
FIELD pH	pH	4.21 - 7.8	6.55 - 8.28	6.38 - 7.34	6.57 - 8.54	6.75 - 8.88	4.21 - 8.84
CONDUCTIVITY	UMHOS/CM	1365 - 5600	625 - 6670	625 - 3690	559 - 6310	1685 - 3290	625 - 5670
TOTAL DISSOLVED SOLIDS	MG/L	869 - 6957	367 - 6623	395 - 3359	305 - 4829	939 - 3010	305 - 6957
NITRATE NITROGEN	MG/L	< 0.02 - 33.19	< 0.01 - 6.06	< 0.05 - 13.8	< 0.05 - 3.0	< 0.01 - 0.64	< 0.01 - 33.19
BORON	MG/L	0.30 - 1.63	0.13 - 3.80	0.21 - 0.83	0.27 - 4.08	0.31 - 0.72	0.13 - 4.08
FLUORIDE	MG/L	0.43 - 3.23	0.24 - 2.04	0.43 - 1.52	0.21 - 3.14	0.62 - 2.48	0.24 - 3.23
TOTAL CYANIDE	MG/L	< 0.002 - 0.02	< 0.002 - 0.01	< 0.01 - < 0.01	< 0.002 - 0.003	< 0.01 - < 0.01	< 0.002 - 0.02
TOTAL SULFIDE	MG/L	< 0.1 - < 0.1	< 0.1 - 0.1	< 0.1 - < 0.1	< 0.1 - 0.8	< 0.1 - < 0.1	< 0.1 - 0.8
Anions							
CHLORIDE	MG/L	34.2 - 260	23.8 - 319	23.6 - 186	21.6 - 509	95.8 - 248	23.6 - 509
SULFATE	MG/L	300 - 4000	35.0 - 3400	90.8 - 1930	5.5 - 2370	262 - 1760	5.5 - 4000
BICARBONATE ALKALINITY	MG/L	228 - 856	232 - 889	126 - 569	196 - 1022	231 - 360	126 - 1022
TOTAL ALKALINITY	MG/L	228 - 856	236 - 889	126 - 569	196 - 1070	236 - 360	126 - 1070
Cations							
SODIUM	MG/L	145 - 573	45.1 - 1060	26.3 - 316	37.7 - 910	128 - 341	26.3 - 1060
POTASSIUM	MG/L	4.4 - 131	2 - 36.4	2.3 - 87.4	2.5 - 15.0	7.0 - 15.6	2 - 131
CALCIUM-HARDNESS	MG/L	247 - 1560	26.5 - 991	149 - 1270	7.5 - 1050	78.2 - 861	7.5 - 1560
MAGNESIUM-HARDNESS	MG/L	56 - 2100	30.5 - 2690	103 - 1190	8.2 - 2320	64.2 - 1090	8.2 - 2690
TOTAL HARDNESS	MG/L	480 - 3380	57.8 - 3230	576 - 2390	15 - 26	142 - 160	15 - 3380
Organic Matter							
SOLUBLE BOD	MG/L	< 0.7 - 8	< 0.7 - 22	< 0.7 - 23	< 0.7 - 87	< 0.7 - 2	< 0.7 - 87
SOLUBLE COD	MG/L	< 1.0 - 40	< 2 - 69	< 2 - 171	< 2 - 222	< 2 - 13	< 1.0 - 222
TOTAL ORGANIC CARBON	MG/L	0.9 - 88	0.31 - 44	0.35 - 22	0.45 - 58	1.7 - 6.1	0.31 - 88
AMMONIA NITROGEN	MG/L	< 0.01 - 2.3	< 0.01 - 14.2	< 0.1 - 5.4	< 0.1 - 5.2	< 0.1 - 0.9	< 0.01 - 14.2
TOTAL ORGANIC HALOGEN	MG/L	< 0.08 - 70	< 0.08 - 710	< 40 - 470	7.5 - 26	64 - 86	< 0.08 - 710
Filtered Metals							
ANTIMONY	MG/L	< 0.0005 - 0.009	< 0.0005 - 0.024	< 0.0005 - 0.011	< 0.0005 - 0.0075	< 0.0005 - 0.015	< 0.0005 - 0.024
ARSENIC	MG/L	< 0.001 - 0.0180	< 0.001 - 0.0183	< 0.0010 - 0.004	< 0.0010 - 0.0199	0.0024 - 0.0078	< 0.001 - 0.0199
BARIUM	MG/L	< 0.02 - 0.13	< 0.01 - 0.11	0.01 - 0.12	< 0.01 - 0.07	0.01 - 0.3	< 0.02 - 0.3
BERYLLIUM	MG/L	< 0.0005 - 0.02	< 0.0005 - < 0.01	< 0.0005 - < 0.01	< 0.0005 - < 0.0025	< 0.0005 - < 0.01	< 0.0005 - 0.02
CADMIUM	MG/L	< 0.001 - 0.06	< 0.001 - 0.04	< 0.001 - < 0.01	< 0.001 - < 0.003	< 0.001 - < 0.01	< 0.001 - 0.06
CHROMIUM	MG/L	< 0.01 - 0.15	< 0.01 - 0.13	< 0.01 - 0.02	< 0.01 - < 0.04	< 0.01 - < 0.02	< 0.01 - 0.15
COBALT	MG/L	< 0.01 - 0.42	< 0.01 - 0.06	< 0.01 - < 0.04	< 0.01 - < 0.02	< 0.01 - < 0.04	< 0.01 - 0.42
COPPER	MG/L	< 0.002 - 0.16	< 0.01 - 0.04	< 0.01 - < 0.02	< 0.01 - < 0.01	< 0.01 - < 0.02	< 0.002 - 0.16
IRON	MG/L	< 0.02 - 28.9	< 0.02 - 27.2	< 0.02 - 1.47	< 0.02 - 1.18	< 0.02 - 2.13	< 0.02 - 28.9
LEAD	MG/L	< 0.02 - 0.06	< 0.02 - 0.04	< 0.02 - < 0.04	< 0.02 - < 0.02	< 0.02 - < 0.04	< 0.02 - 0.06
MERCURY	MG/L	< 0.0001 - 0.0002	< 0.0001 - 0.0004	< 0.0001 - < 0.0001	< 0.0001 - 0.0001	< 0.0001 - < 0.0001	< 0.0001 - 0.0004
NICKEL	MG/L	< 0.02 - 1.66	< 0.02 - 2.5	< 0.02 - < 0.03	< 0.02 - 0.04	< 0.02 - < 0.03	< 0.02 - 2.5
SELENIUM	MG/L	< 0.0009 - 0.029	< 0.001 - 0.007	< 0.0010 - 0.0065	< 0.0010 - 0.0071	< 0.0010 - 0.002	< 0.0009 - 0.029
SILVER	MG/L	< 0.005 - 0.014	< 0.005 - 0.014	< 0.005 - < 0.01	< 0.01 - < 0.01	< 0.005 - < 0.01	< 0.005 - 0.014
THALLIUM	MG/L	< 0.001 - < 0.10	< 0.001 - < 0.10	< 0.002 - < 0.05	< 0.001 - < 0.005	< 0.002 - < 0.060	< 0.001 - < 0.10
TIN	MG/L	< 0.05 - < 0.05	< 0.05 - < 0.05	< 0.05 - < 0.05	< 0.05 - < 0.05	< 0.05 - < 0.05	< 0.05 - < 0.05
VANADIUM	MG/L	< 0.05 - < 0.05	< 0.05 - < 0.05	< 0.05 - < 0.05	< 0.05 - < 0.07	< 0.05 - < 0.05	< 0.05 - < 0.07
ZINC	MG/L	< 0.01 - 0.85	< 0.01 - 1.20	< 0.01 - 0.10	< 0.01 - 0.07	< 0.01 - 0.07	< 0.01 - 1.20

NOTES:

Data are from ground water samples collected from 1987 through 1997.

(1) - Data obtained from wells M17A, M18A, M23A, M41A, M42A, M43A, and piezometers P18, S1, and S16.

(2) - Data obtained from wells M19B and piezometers P14, P15, P16, DM1, DM3, DM4, DM5, DM6, DM8A, DM8B, DM18, DM18A, DM19, DM22, DM23, DM24A, and DM25.

(3) - Data obtained from piezometers P17, P19, DM2, DM3A, DM3B, DM9, DM16, DM17, and DM17A.

(4) - Data obtained from piezometers S6, DM7, DM8A, DM10, DM10A, DM13, DM13A, DM14, DM15, DM21, DM21A, DM32, DM32A, DM33, DM34, and DM35.

(5) - Data obtained from piezometers P20, DM20, DM20A, and DM20B.

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LABORATORY DATA SYSTEM - Landfill Data : PHLF										10/06/05	Page 1
NO.	LOCATION	TYPE	DATE	LOG NO.	DESCRIPTION	DATA	STATUS				
1.	PHLF M33A	WELL	03/11/94	SJ73340	PHLF, WELL M33A		COMPLETE	APPROVED			
2.	PHLF M31A	WELL	03/22/94	SJ73839	PUENTE HILLS LANDFILL, WELL M31A		COMPLETE	APPROVED			
3.	PHLF RMW6	WELL	03/25/94	SJ74076	REPLACEMENT WELL RMW6, PHLF		COMPLETE	APPROVED			
4.	PHLF RMW6	WELL	06/03/94	SJ77183	REPLACEMENT WELL RMW6, PHLF		COMPLETE	APPROVED			
5.	PHLF M31A	WELL	06/27/94	SJ78257	PUENTE HILLS LANDFILL, WELL# M31A		COMPLETE	APPROVED			
6.	PHLF M33A	WELL	06/28/94	SJ78316	PUENTE HILLS LANDFILL, WELL# M33A		COMPLETE	APPROVED			
7.	PHLF RMW6	WELL	09/09/94	SJ81427	REPLACEMENT WELL RMW6, PHLF		COMPLETE	APPROVED			
8.	PHLF M31A	WELL	09/27/94	SJ82154	PUENTE HILLS LANDFILL, WELL# M31A		COMPLETE	APPROVED			
9.	PHLF M33A	WELL	09/28/94	SJ82272	PUENTE HILLS LANDFILL, WELL# M33A		COMPLETE	APPROVED			
10.	PHLF R32B	WELL	12/29/94	SJ86862	PUENTE HILLS LANDFILL, WELL R32B, SUBTITLE D SAMPLE		COMPLETE	APPROVED			
11.	PHLF R34B	WELL	12/29/94	SJ86863	PUENTE HILLS LANDFILL, WELL R34B, SUBTITLE D SAMPLE		COMPLETE	APPROVED			
12.	PHLF RMW6	WELL	03/01/95	SJ92681	RMW6, PHLF, SUBTITLE D		COMPLETE	APPROVED			
13.	PHLF M31A	WELL	03/06/95	SJ92852	M31A, PHLF, SUBTITLE D SAMPLE		COMPLETE	APPROVED			
14.	PHLF M31A	WELL	03/06/95	SJ92853	M31A, (DUPLICATE), PHLF, SUBTITLE D SAMPLE		COMPLETE	APPROVED			
15.	PHLF M33A	WELL	03/06/95	SJ92854	M33A, PHLF, SUBTITLE D SAMPLE		COMPLETE	APPROVED			
16.	PHLF R32B	WELL	03/17/95	SJ93483	PUENTE HILLS LANDFILL, WELL R32B, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
17.	PHLF R32B	WELL	03/17/95	SJ93484	PUENTE HILLS, WELL R32B (DUP), PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
18.	PHLF R34B	WELL	03/17/95	SJ93485	PUENTE HILLS LANDFILL, WELL R34B, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
19.	PHLF R34B	WELL	06/21/95	SJ97718	PUENTE HILLS LANDFILL, WELL R34B - SUBTITLE D		COMPLETE	APPROVED			
20.	PHLF R34B	WELL	06/21/95	SJ97719	PUENTE HILLS LANDFILL, WELL R34B - SUBTITLE D (DUPLICATE)		COMPLETE	APPROVED			
21.	PHLF R32B	WELL	06/21/95	SJ97720	PUENTE HILLS LANDFILL, WELL R32B - SUBTITLE D		COMPLETE	APPROVED			
22.	PHLF R32B	WELL	09/13/95	SJ01356	WELL# R32B, PHLF (SUBTITLE D)		COMPLETE	APPROVED			
23.	PHLF R34B	WELL	09/13/95	SJ01364	WELL# R34B, PHLF (SUBTITLE D)		COMPLETE	APPROVED			
24.	PHLF R34B	WELL	09/13/95	SJ01365	WELL# R34B, PHLF (SUBTITLE D) - DUPLICATE		COMPLETE	APPROVED			
25.	PHLF R32B	WELL	12/11/95	SJ05128	PUENTE HILLS LANDFILL, WELL R32B (SUBTITLE D)		COMPLETE	APPROVED			
26.	PHLF R34B	WELL	12/11/95	SJ05129	PUENTE HILLS LANDFILL, WELL R34B (SUBTITLE D)		COMPLETE	APPROVED			
27.	PHLF M31A	WELL	09/02/97	SJ40115	BARRIER 3 ALLUVIAL WELL, M31A, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
28.	PHLF M33A	WELL	09/02/97	SJ40116	BARRIER 3 ALLUVIAL WELL, M33A, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
29.	PHLF EMP1	WELL	09/02/97	SJ40120	EVALUATION MONITORING WELL EMP1, PHLF, (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
30.	PHLF EMP1	WELL	09/02/97	SJ40121	EVALUATION MONITORING WELL EMP1, PHLF, (DUPLICATE)		COMPLETE	APPROVED			
31.	PHLF EMP2	WELL	09/03/97	SJ40160	EVALUATION MONITORING WELL, EMP2, PHLF, (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
32.	PHLF RMW6	WELL	09/04/97	SJ40227	BARRIER 1 WELL, RMW6, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
33.	PHLF RMW6	WELL	09/04/97	SJ40228	BARRIER 1 WELL, RMW6, PHLF (SUBTITLE D SAMPLE) DUPLICATE		COMPLETE	APPROVED			
34.	PHLF M04B	WELL	09/18/97	SJ40750	BARRIER 1 BEDROCK WELL, M04B, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
35.	PHLF M05A	WELL	09/18/97	SJ40751	BARRIER 1 ALLUVIAL WELL, M05A, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
36.	PHLF M04A	WELL	09/18/97	SJ40755	BARRIER 1 ALLUVIAL WELL, M04A, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
37.	PHLF M04A	WELL	09/18/97	SJ40756	BARRIER 1 ALLUVIAL WELL, M04A, PHLF (SUBTITLE D) DUPLICATE		COMPLETE	APPROVED			
38.	PHLF M11A	WELL	09/30/97	SJ41139	BARRIER 1 ALLUVIAL WELL, M11A, PHLF (SUB-TITLE D SAMPLE)		COMPLETE	APPROVED			
39.	PHLF M11A	WELL	09/30/97	SJ41140	BARRIER 1 ALLUVIAL WELL, M11A, PHLF (SUBTITLE D) DUPLICATE		COMPLETE	APPROVED			
40.	PHLF M10B	WELL	10/01/97	SJ41193	BARRIER 1 BEDROCK WELL, M10B, PHLF (SUB-TITLE D)		COMPLETE	APPROVED			

LABORATORY DATA SYSTEM - Landfill Data : PHLF										10/06/05	Page 2
NO.	LOCATION	TYPE	DATE	LOG NO.	DESCRIPTION				STATUS		
41.	PHLF M10B	WELL	10/01/97	SJ41194	BARRIER 1	BEDROCK WELL, M10B, PHLF	(SUB-TITLE D) DUPLICATE	COMPLETE, APPROVED			
42.	PHLF M11A	WELL	12/11/97	SJ43712	BARRIER 1	MONITORING WELL M11A, PHLF	(SUBTITLE D, DUPLICATE)	COMPLETE, APPROVED			
43.	PHLF M11A	WELL	12/11/97	SJ43713	BARRIER 1	MONITORING WELL M11A, PHLF	(SUBTITLE D, DUPLICATE)	COMPLETE, APPROVED			
44.	PHLF M04B	WELL	12/19/97	SJ44014	BARRIER 1	MONITORING WELL M04B, PHLF	(SUBTITLE D SAMPLE)	COMPLETE, APPROVED			
45.	PHLF M11A	WELL	03/06/98	SJ52359	BARRIER 1	MONITORING WELL M11A, PHLF	(SUBTITLE D SAMPLE)	COMPLETE, APPROVED			
46.	PHLF M04B	WELL	03/25/98	SJ53111	BARRIER 1	MONITORING WELL M04B, PHLF	(SUBTITLE D SAMPLE)	COMPLETE, APPROVED			
47.	PHLF M04B	WELL	06/01/98	SJ55818	BARRIER 1	MONITORING WELL M04B, PHLF	(SUBTITLE D SAMPLE)	COMPLETE, APPROVED			
48.	PHLF M11A	WELL	06/08/98	SJ56098	BARRIER 1	MONITORING WELL M11A, PHLF	(SUBTITLE D SAMPLE)	COMPLETE, APPROVED			
49.	PHLF M04A	WELL	09/09/98	SJ59708	BARRIER 1	ALLUVIAL WELL, M04A, PHLF	(SUBTITLE D SAMPLE)	COMPLETE, APPROVED			
50.	PHLF M04A	WELL	09/09/98	SJ59709	BARRIER 1	ALLUVIAL WELL, M04A, PHLF	(SUBTITLE D) DUPLICATE	COMPLETE, APPROVED			
51.	PHLF M10B	WELL	09/09/98	SJ59713	BARRIER 1	BEDROCK WELL, M10B, PHLF	(SUBTITLE D SAMPLE)	COMPLETE, APPROVED			
52.	PHLF EMP2	WELL	09/09/98	SJ59714	EVALUATION	MONITORING WELL, EMP2, PHLF	(SUBTITLE D SAMPLE)	COMPLETE, APPROVED			
53.	PHLF EMP1	WELL	09/10/98	SJ59811	EVALUATION	MONITORING WELL, EMP1, PHLF	(SUBTITLE D SAMPLE)	COMPLETE, APPROVED			
54.	PHLF EMP1	WELL	09/10/98	SJ59812	EVALUATION	MONITORING WELL, EMP1, PHLF	(SUBTITLE D) DUPLICATE	COMPLETE, APPROVED			
55.	PHLF M31A	WELL	09/10/98	SJ59816	BARRIER 3	ALLUVIAL WELL, M31A, PHLF	(SUBTITLE D SAMPLE)	COMPLETE, APPROVED			
56.	PHLF M33A	WELL	09/10/98	SJ59817	BARRIER 3	ALLUVIAL WELL, M33A, PHLF	(SUBTITLE D SAMPLE)	COMPLETE, APPROVED			
57.	PHLF M05A	WELL	09/11/98	SJ59855	BARRIER 1	ALLUVIAL WELL, M05A, PHLF	(SUBTITLE D SAMPLE)	COMPLETE, APPROVED			
58.	PHLF RMW6	WELL	09/14/98	SJ59898	BARRIER 1	WELL, RMW6, PHLF	(SUBTITLE D SAMPLE)	COMPLETE, APPROVED			
59.	PHLF RMW6	WELL	09/14/98	SJ59899	BARRIER 1	WELL, RMW6, PHLF	(SUBTITLE D SAMPLE) DUPLICATE	COMPLETE, APPROVED			
60.	PHLF EMP1	WELL	06/07/99	SJ06705	EVALUATION	MONITORING WELL, EMP1, PHLF,	(SUB D)	COMPLETE, APPROVED			
61.	PHLF EMP1	WELL	06/07/99	SJ06706	EVALUATION	MONITORING WELL, EMP1, PHLF	(SUB D) (DUPLICATE)	COMPLETE, APPROVED			
62.	PHLF EMP2	WELL	06/08/99	SJ06788	EVALUATION	MW, EMP2, PHLF	(SUB D SAMPLE)	COMPLETE, APPROVED			
63.	PHLF M10B	WELL	09/01/99	SJ09942	BARRIER 1	BEDROCK WELL, M10B, PHLF	(SUB D)	COMPLETE, APPROVED			
64.	PHLF M11A	WELL	09/01/99	SJ09943	BARRIER 1	ALLUVIAL WELL, M11A, PHLF	(SUB D)	COMPLETE, APPROVED			
65.	PHLF M31A	WELL	09/02/99	SJ09990	BARRIER 3	ALLUVIAL WELL M31A, PHLF	(SUB D SAMPLE)	COMPLETE, APPROVED			
66.	PHLF R32B	WELL	09/02/99	SJ09991	BARRIER 3	BEDROCK WELL R32B, PHLF	(SUB D SAMPLE)	COMPLETE, APPROVED			
67.	PHLF M04B	WELL	09/03/99	SJ10037	BARRIER 1	BEDROCK WELL, M04B, (SUB D SAMPLE)		COMPLETE, APPROVED			
68.	PHLF M04B	WELL	09/03/99	SJ10038	BARRIER 1	BEDROCK WELL, M04B, (SUB D SAMPLE)	DUP	COMPLETE, APPROVED			
69.	PHLF EMP2	WELL	09/03/99	SJ10046	EVAL. MON.	WELL, EMP2, PHLF	(SUBTITLE D SAMPLE)	COMPLETE, APPROVED			
70.	PHLF M04A	WELL	09/16/99	SJ10472	BARRIER 1	ALLUVIAL WELL, M04A, PHLF	(SUB D SAMPLE)	COMPLETE, APPROVED			
71.	PHLF M04A	WELL	09/16/99	SJ10473	BARRIER 1	ALLUVIAL WELL, M04A, PHLF	(SUB D SAMPLE) (DUP)	COMPLETE, APPROVED			
72.	PHLF M05A	WELL	09/16/99	SJ10478	BARRIER 1	ALLUVIAL WELL, M05A, PHLF	(SUB D SAMPLE)	COMPLETE, APPROVED			
73.	PHLF EMP1	WELL	09/17/99	SJ10524	EVALUATION	MONITORING WELL EMP1, PHLF,	(SUBTITLE D SAMPLE)	COMPLETE, APPROVED			
74.	PHLF EMP1	WELL	09/17/99	SJ10525	EVALUATION	MONITORING WELL EMP1, PHLF,	(SUB D SAMPLE) (DUP)	COMPLETE, APPROVED			
75.	PHLF M33A	WELL	09/17/99	SJ10537	BARRIER 3	ALLUVIAL WELL M33A, PHLF,	(SUB D SAMPLE)	COMPLETE, APPROVED			
76.	PHLF R34B	WELL	09/17/99	SJ10538	BARRIER 3	BEDROCK WELL R34B, PHLF,	(SUB D SAMPLE)	COMPLETE, APPROVED			
77.	PHLF RMW6	WELL	09/20/99	SJ10581	BARRIER 1	WELL, RMW6, PHLF	(SUB D SAMPLE)	COMPLETE, APPROVED			
78.	PHLF M10B	WELL	09/06/00	SJ31022	BARRIER 1	BEDROCK WELL, M10B, PHLF	(SUB D SAMPLE)	COMPLETE, APPROVED			
79.	PHLF M33A	WELL	09/07/00	SJ31064	BARRIER 3	ALLUVIAL WELL, M33A, PHLF	(SUB D SAMPLE)	COMPLETE, APPROVED			
80.	PHLF M05A	WELL	09/08/00	SJ31111	BARRIER 1	ALLUVIAL WELL, M05A, PHLF	(SUB D SAMPLE)	COMPLETE, APPROVED			

LABORATORY DATA SYSTEM - Landfill Data : PHLF										10/06/05	Page	3
NO.	LOCATION	TYPE	DATE	LOG NO.	DESCRIPTION	D A T A	S A M P L E	S T A T U S	S T A T U S			
81.	PHLF RMW6	WELL	09/08/00	SJ31137	BARRIER 1 WELL, RMW6, PHLF (SUBTITLE D SAMPLE)			COMPLETE, APPROVED				
82.	PHLF RMW6	WELL	09/08/00	SJ31138	BARRIER 1 WELL, RMW6, PHLF (SUBTITLE D SAMPLE) DUP			COMPLETE, APPROVED				
83.	PHLF M31A	WELL	09/11/00	SJ31170	BARRIER 3 ALLUVIAL WELL, M31A, PHLF (SUB D)			COMPLETE, APPROVED				
84.	PHLF M04A	WELL	09/12/00	SJ31233	BARRIER 1 ALLUVIAL WELL, M04A; PHLF (SUB D SAMPLE)			COMPLETE, APPROVED				
85.	PHLF M04A	WELL	03/03/03	SJ83039	BARRIER 1 MONITORING WELL M04A, PHLF, (SUBTITLE D)			COMPLETE, APPROVED				
86.	PHLF M04A	WELL	03/03/03	SJ83040	BARRIER 1 MONITORING WELL M04A, PHLF, (SUBTITLE D) (DUP)			COMPLETE, APPROVED				
87.	PHLF M10B	WELL	03/06/03	SJ83252	BARRIER 1 MONITORING WELL M10B, PHLF (SUB D)			COMPLETE, APPROVED				
88.	PHLF RMW6	WELL	03/07/03	SJ83319	BARRIER 1 MONITORING WELL RMW6, PHLF (SUBTITLE D)			COMPLETE, APPROVED				
89.	PHLF M31A	WELL	03/11/03	SJ83455	BARRIER 1 MONITORING WELL M31A, PHLF (SUBTITLE D)			COMPLETE, APPROVED				
90.	PHLF M05A	WELL	03/12/03	SJ83567	BARRIER 1 MONITORING WELL M05A, PHLF (SUB-D)			COMPLETE, APPROVED				
91.	PHLF M33A	WELL	03/17/03	SJ83819	BARRIER 3 MONITORING WELL M33A, PHLF (SUB D)			COMPLETE, APPROVED				
92.	PHLF R32B	WELL	03/02/04	SJ03343	BARRIER 3 WELL R32B, PHLF (SUB D)			COMPLETE, APPROVED				
93.	PHLF R34B	WELL	03/02/04	SJ03346	BARRIER 1 WELL R34B, PHLF (SUB D)			COMPLETE, APPROVED				
94.	PHLF R34B	WELL	03/02/04	SJ03347	BARRIER 1 WELL R34B, PHLF (SUB D) (DUP)			COMPLETE, APPROVED				
95.	PHLF M11A	WELL	03/05/04	SJ03615	BARRIER 1 WELL M11A, PHLF (SUB D)			COMPLETE, APPROVED				
96.	PHLF M11A	WELL	03/05/04	SJ03616	BARRIER 1 WELL M11A, PHLF (SUB D) (DUPLICATE)			COMPLETE, APPROVED				
97.	PHLF EMP1	WELL	03/08/04	SJ03662	EMP WELL EMP1, PHLF (SUB D)			COMPLETE, APPROVED				
98.	PHLF EMP1	WELL	03/08/04	SJ03663	EMP WELL EMP1, PHLF (SUB D) (DUP)			COMPLETE, APPROVED				
99.	PHLF M04B	WELL	03/09/04	SJ03776	BARRIER 1 WELL M04B, PHLF (SUB D)			COMPLETE, APPROVED				
100.	PHLF M04B	WELL	03/09/04	SJ03777	BARRIER 1 WELL M04B, PHLF (SUB D) (DUP)			COMPLETE, APPROVED				
101.	PHLF EMP2	WELL	03/11/04	SJ03990	EMP WELL EMP2, PHLF (SUB D)			COMPLETE, APPROVED				
102.	PHLF EMP2	WELL	03/11/04	SJ03991	EMP WELL EMP2, PHLF (SUB D) (DUP)			COMPLETE, APPROVED				

LABORATORY DATA SYSTEM - Landfill Data : PHLF										10/06/05	Page 1
NO.	LOCATION	TYPE	DATE	LOG NO.	DESCRIPTION	D A T A	STATUS				
1.	PHLF M24A	WELL	03/23/94	SJ73925	PUNTE HILLS LANDFILL, WELL M24A		COMPLETE	APPROVED			
2.	PHLF M27B	WELL	03/23/94	SJ73926	PUNTE HILLS LANDFILL, WELL M27B		COMPLETE	APPROVED			
3.	PHLF M24A	WELL	06/23/94	SJ78116	PUNTE HILLS LANDFILL, WELL# M24A		COMPLETE	APPROVED			
4.	PHLF M27B	WELL	06/23/94	SJ78117	PUNTE HILLS LANDFILL, WELL# M27B		COMPLETE	APPROVED			
5.	PHLF M24A	WELL	09/26/94	SJ82122	PUNTE HILLS LANDFILL, WELL# M24A		COMPLETE	APPROVED			
6.	PHLF M27B	WELL	09/26/94	SJ82123	PUNTE HILLS LANDFILL, WELL# M27B		COMPLETE	APPROVED			
7.	PHLF M24A	WELL	03/06/95	SJ92866	PHLF WELL M24A, SUBTITLE D SAMPLE		COMPLETE	APPROVED			
8.	PHLF M27B	WELL	03/06/95	SJ92867	PHLF WELL M27B, SUBTITLE D SAMPLE		COMPLETE	APPROVED			
9.	PHLF M41A	WELL	07/07/95	SJ98350	BARRIER 4 DOWNGRADEMENT ALLUVIAL WELL, M41A (SUBTITLE D)		COMPLETE	APPROVED			
10.	PHLF M42A	WELL	07/07/95	SJ98351	BARRIER 4 DOWNGRADEMENT ALLUV. MONIT. WELL M42A (SUBTITLE D)		COMPLETE	APPROVED			
11.	PHLF M43A	WELL	07/07/95	SJ98352	BARRIER 4 DOWNGRADEMENT ALLUV. MONIT. WELL M43A (SUBTITLE D)		COMPLETE	APPROVED			
12.	PHLF M41A	WELL	07/07/95	SJ98354	BARRIER 4 DOWNGRADEMENT ALLUVIAL WELL M41A (SUBTITLE D)		COMPLETE	APPROVED			
13.	PHLF M41A	WELL	09/19/95	SJ01613	WELL# M41A, PHLF (SUBTITLE D)		COMPLETE	APPROVED			
14.	PHLF M42A	WELL	12/12/95	SJ05176	BAR 4 DOWNGRADEMENT ALLUVIAL MONIT WELL, M42A (SUBTITLE D)		COMPLETE	APPROVED			
15.	PHLF M41A	WELL	12/21/95	SJ05568	PUNTE HILLS LANDFILL, M41A, PHLF (SUBTITLE D)		COMPLETE	APPROVED			
16.	PHLF M43A	WELL	12/21/95	SJ05578	BAR 4 DOWNGRADEMENT ALLUVIAL MONIT. WELL M43A (SUBTITLE D)		COMPLETE	APPROVED			
17.	PHLF M41A	WELL	03/15/96	SJ13374	PUNTE HILLS LANDFILL, WELL M41A (SUBTITLE D)		COMPLETE	APPROVED			
18.	PHLF M42A	WELL	03/20/96	SJ13553	PUNTE HILLS LANDFILL, WELL M42A (SUBTITLE D)		COMPLETE	APPROVED			
19.	PHLF M43A	WELL	03/20/96	SJ13554	PUNTE HILLS LANDFILL, WELL M43A (SUBTITLE D)		COMPLETE	APPROVED			
20.	PHLF M41A	WELL	06/05/96	SJ17740	BARRIER 4 ALLUVIAL WELL M41A, PHLF (SUBTITLE D)		COMPLETE	APPROVED			
21.	PHLF M42A	WELL	06/05/96	SJ17749	BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUBTITLE D)		COMPLETE	APPROVED			
22.	PHLF M43A	WELL	06/05/96	SJ17750	BARRIER 4 ALLUVIAL WELL M43A, PHLF (SUBTITLE D)		COMPLETE	APPROVED			
23.	PHLF M41A	WELL	09/04/96	SJ21318	BARRIER 4 ALLUVIAL WELL M41A, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
24.	PHLF M43A	WELL	09/10/96	SJ21538	BARRIER 4 ALLUVIAL WELL M43A, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
25.	PHLF M42A	WELL	09/11/96	SJ21637	BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
26.	PHLF M41A	WELL	12/02/96	SJ24710	BARRIER 4 ALLUVIAL WELL M41A, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
27.	PHLF M42A	WELL	12/03/96	SJ24799	BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
28.	PHLF M43A	WELL	12/04/96	SJ24859	BARRIER 4 ALLUVIAL WELL M43A, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
29.	PHLF M41A	WELL	03/20/97	SJ33054	BARRIER 4 ALLUVIAL WELL M41A, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
30.	PHLF M41A	WELL	03/20/97	SJ33055	BARRIER 4 ALLUVIAL WELL M41A, PHLF (SUBTITLE D) DUPLICATE		COMPLETE	APPROVED			
31.	PHLF M42A	WELL	03/20/97	SJ33068	BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
32.	PHLF M43A	WELL	03/20/97	SJ33069	BARRIER 4 ALLUVIAL WELL M43A, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
33.	PHLF M43A	WELL	06/11/97	SJ36370	BARRIER 4 ALLUVIAL WELL M43A, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
34.	PHLF M43A	WELL	06/11/97	SJ36371	BARRIER 4 ALLUVIAL WELL M43A, PHLF (SUBTITLE D) DUPLICATE		COMPLETE	APPROVED			
35.	PHLF M42A	WELL	06/11/97	SJ36375	BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
36.	PHLF M41A	WELL	06/11/97	SJ36376	BARRIER 4 ALLUVIAL WELL M41A, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
37.	PHLF EMP3	WELL	09/04/97	SJ40223	EVALUATION MONITORING WELL, EMP3, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
38.	PHLF EMP5	WELL	09/05/97	SJ40261	EVALUATION MONITORING WELL, EMP5, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			
39.	PHLF EMP5	WELL	09/05/97	SJ40262	EVALUATION MONITORING WELL, EMP5, PHLF (DUPLICATE)		COMPLETE	APPROVED			
40.	PHLF M41A	WELL	09/08/97	SJ40288	BARRIER 4 ALLUVIAL WELL M41A, PHLF (SUBTITLE D SAMPLE)		COMPLETE	APPROVED			

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NO.	LOCATION	TYPE	DATE	LOG NO.	DESCRIPTION	D A T A	S A M P L E	STATUS	STATUS		
41.	PHLF M42A	WELL	09/08/97	SJ40289	BARRIER 4 ALLUVIAL WELL M42A, PHLF, (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
42.	PHLF M43A	WELL	09/08/97	SJ40293	BARRIER 4 ALLUVIAL WELL M43A, PHLF, (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
43.	PHLF M43A	WELL	09/08/97	SJ40294	BARRIER 4 ALLUVIAL WELL M43A, PHLF, (SUBTITLE D) DUPLICATE			COMPLETE, APPROVED			
44.	PHLF EMP4	WELL	09/10/97	SJ40401	EVALUATION MONITORING WELL, EMP4, PHLF, (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
45.	PHLF M42A	WELL	12/10/97	SJ43620	BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
46.	PHLF M43A	WELL	12/10/97	SJ43621	BARRIER 4 ALLUVIAL WELL M43A, PHLF (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
47.	PHLF M41A	WELL	12/10/97	SJ43625	BARRIER 4 ALLUVIAL WELL M41A, PHLF (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
48.	PHLF M41A	WELL	12/10/97	SJ43626	BARRIER 4 ALLUVIAL WELL M41A, PHLF (SUB D SAMPLE) DUPLICATE			COMPLETE, APPROVED			
49.	PHLF M41A	WELL	03/04/98	SJ52266	BARRIER 4 ALLUVIAL WELL M41A, PHLF (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
50.	PHLF M42A	WELL	03/04/98	SJ52267	BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
51.	PHLF M43A	WELL	03/04/98	SJ52271	BARRIER 4 ALLUVIAL WELL M43A, PHLF (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
52.	PHLF M43A	WELL	03/04/98	SJ52272	BARRIER 4 ALLUVIAL WELL M43A, PHLF (SUBTITLE D) DUPLICATE			COMPLETE, APPROVED			
53.	PHLF M42A	WELL	06/02/98	SJ55859	BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
54.	PHLF M42A	WELL	06/02/98	SJ55860	BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUBTITLE D SAMPLE) DUP			COMPLETE, APPROVED			
55.	PHLF M41A	WELL	06/02/98	SJ55867	BARRIER 4 ALLUVIAL WELL M41A, PHLF, (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
56.	PHLF M43A	WELL	06/02/98	SJ55868	BARRIER 4 ALLUVIAL WELL M43A, PHLF, (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
57.	PHLF EMP5	WELL	09/03/98	SJ59580	EVALUATION MONITORING WELL, EMP5, PHLF (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
58.	PHLF EMP5	WELL	09/03/98	SJ59581	EVALUATION MONITORING WELL, EMP5, PHLF (SUBTITLE D SAMPLE) DUP			COMPLETE, APPROVED			
59.	PHLF EMP4	WELL	09/08/98	SJ59670	EVALUATION MONITORING WELL, EMP4, PHLF (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
60.	PHLF M47B	WELL	09/08/98	SJ59674	BARRIER 4 MONITORING WELL M47B, PHLF, (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
61.	PHLF M47B	WELL	09/08/98	SJ59675	BARRIER 4 MONITORING WELL M47B, PHLF, (SUBTITLE D) DUPLICATE			COMPLETE, APPROVED			
62.	PHLF EMP3	WELL	09/14/98	SJ59902	EVALUATION MONITORING WELL, EMP3, PHLF, (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
63.	PHLF M43A	WELL	09/15/98	SJ59940	BARRIER 4 ALLUVIAL WELL M43A, PHLF, (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
64.	PHLF M43A	WELL	09/15/98	SJ59941	BARRIER 4 ALLUVIAL WELL M43A, PHLF, (SUBTITLE D) DUPLICATE			COMPLETE, APPROVED			
65.	PHLF M41A	WELL	09/15/98	SJ59945	BARRIER 4 ALLUVIAL WELL M41A, PHLF, (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
66.	PHLF M42A	WELL	09/15/98	SJ59946	BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
67.	PHLF M41A	WELL	12/15/98	SJ63796	BARRIER 4 ALLUVIAL WELL M41A, PHLF, (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
68.	PHLF M47B	WELL	12/15/98	SJ63797	BARRIER 4 MONITORING WELL M47B, PHLF (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
69.	PHLF M42A	WELL	12/16/98	SJ63898	BARRIER 4 ALLUVIAL WELL M42A, PHLF, (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
70.	PHLF M43A	WELL	12/16/98	SJ63899	BARRIER 4 ALLUVIAL WELL M43A, PHLF, (SUBTITLE D SAMPLE)			COMPLETE, APPROVED			
71.	PHLF M41A	WELL	03/02/99	SJ02571	BARRIER 4 ALLUVIAL WELL M41A, PHLF, (SUB D SAMPLE)			COMPLETE, APPROVED			
72.	PHLF M41A	WELL	03/02/99	SJ02572	BARRIER 4 ALLUVIAL WELL M41A, PHLF, (SUB D SAMPLE) (DUP)			COMPLETE, APPROVED			
73.	PHLF M42A	WELL	03/02/99	SJ02583	BARRIER 4 ALLUVIAL WELL M42A, PHLF, (SUB D SAMPLE)			COMPLETE, APPROVED			
74.	PHLF M43A	WELL	03/02/99	SJ02584	BARRIER 4 ALLUVIAL WELL M43A, PHLF (SUB D SAMPLE)			COMPLETE, APPROVED			
75.	PHLF M47B	WELL	03/04/99	SJ02801	BARRIER 4 MONITORING WELL M47B, PHLF (SUB D SAMPLE)			COMPLETE, APPROVED			
76.	PHLF M47B	WELL	03/04/99	SJ02802	BARRIER 4 MONITORING WELL M47B, PHLF (SUB D SAMPLE) (DUP)			COMPLETE, APPROVED			
77.	PHLF M47B	WELL	06/02/99	SJ06487	BARRIER 4 MONITORING WELL M47B, PHLF, (SUB D SAMPLE)			COMPLETE, APPROVED			
78.	PHLF EMP4	WELL	06/08/99	SJ06782	EVALUATION MW, EMP4, PHLF, (SUB D SAMPLE)			COMPLETE, APPROVED			
79.	PHLF EMP4	WELL	06/08/99	SJ06783	EVALUATION MW, EMP4, PHLF, (SUB D SAMPLE) (DUP)			COMPLETE, APPROVED			
80.	PHLF EMP3	WELL	06/08/99	SJ06789	EVALUATION MW, EMP3, PHLF, (SUB D SAMPLE)			COMPLETE, APPROVED			

LABORATORY DATA SYSTEM - Landfill Data : PHLF										10/06/05	Page 3
NO.	LOCATION	TYPE	DATE	LOG NO.	DESCRIPTION	DATA	SAMPLE	STATUS	STATUS		
81.	PHLF M41A	WELL	06/09/99	SJ06822	BARRIER 4 ALLUVIAL WELL M41A, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
82.	PHLF M43A	WELL	06/09/99	SJ06823	BARRIER 4 ALLUVIAL WELL M43A, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
83.	PHLF M42A	WELL	06/09/99	SJ06842	BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
84.	PHLF M42A	WELL	06/09/99	SJ06843	BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUB D SAMPLE) (DUP)			COMPLETE	APPROVED		
85.	PHLF EMP6	WELL	06/10/99	SJ06879	VAL. MONITORING WELL, EMP6, PHLF, (SUBTITLE D SAMPLE)			COMPLETE	APPROVED		
86.	PHLF M27B	WELL	09/02/99	SJ09994	BARRIER 2 BEDROCK WELL M27B, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
87.	PHLF EMP4	WELL	09/07/99	SJ10079	EVALUATION MONITORING WELL, EMP4, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
88.	PHLF M47B	WELL	09/07/99	SJ10093	BARRIER 4 MONITORING WELL M47B, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
89.	PHLF M47B	WELL	09/07/99	SJ10094	BARRIER 4 MONITORING WELL M47B, PHLF (SUB D SAMPLE) DUP			COMPLETE	APPROVED		
90.	PHLF EMP3	WELL	09/13/99	SJ10299	EVALUATION MONITORING WELL, EMP3, PHLF (SUBTITLE D SAMPLE)			COMPLETE	APPROVED		
91.	PHLF M42A	WELL	09/13/99	SJ10312	BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUB D)			COMPLETE	APPROVED		
92.	PHLF M42A	WELL	09/13/99	SJ10313	BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUB D) (DUP)			COMPLETE	APPROVED		
93.	PHLF EMP6	WELL	09/14/99	SJ10328	EVALUATION MONITORING WELL, EMP6, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
94.	PHLF M43A	WELL	09/14/99	SJ10341	BARRIER 4 ALLUVIAL WELL M43A, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
95.	PHLF M43A	WELL	09/14/99	SJ10342	BARRIER 4 ALLUVIAL WELL M43A, PHLF (DUP) (SUB D SAMPLE)			COMPLETE	APPROVED		
96.	PHLF M41A	WELL	09/15/99	SJ10398	BARRIER 4 ALLUVIAL WELL M41A, PHLF (SUB D)			COMPLETE	APPROVED		
97.	PHLF EMP5	WELL	09/16/99	SJ10477	EVALUATION MONITORING WELL, EMP5, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
98.	PHLF M24A	WELL	09/20/99	SJ10599	BARRIER 2 ALLUVIAL WELL M24A, PHLF (SUB D)			COMPLETE	APPROVED		
99.	PHLF M47B	WELL	12/07/99	SJ13858	BARRIER 4 MONITORING WELL M47B, PHLF (SUB D)			COMPLETE	APPROVED		
100.	PHLF M47B	WELL	12/07/99	SJ13859	BARRIER 4 MONITORING WELL M47B, PHLF (SUB D) (DUP)			COMPLETE	APPROVED		
101.	PHLF M51A	WELL	12/07/99	SJ13860	BARRIER 5 MONITORING WELL M51A, PHLF (SUB D)			COMPLETE	APPROVED		
102.	PHLF EMP6	WELL	12/09/99	SJ13944	EVALUATION MONITORING WELL, EMP6, PHLF (SUB D)			COMPLETE	APPROVED		
103.	PHLF EMP6	WELL	12/09/99	SJ13945	EVALUATION MONITORING WELL, EMP6, PHLF (SUB D) (DUP)			COMPLETE	APPROVED		
104.	PHLF M42A	WELL	12/10/99	SJ13989	BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
105.	PHLF M43A	WELL	12/10/99	SJ13990	BARRIER 4 ALLUVIAL WELL M43A, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
106.	PHLF M41A	WELL	12/10/99	SJ14008	BARRIER 4 ALLUVIAL WELL M41A, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
107.	PHLF M41A	WELL	12/10/99	SJ14009	BARRIER 4 ALLUVIAL WELL M41A, PHLF (SUB D SAMPLE) (DUP)			COMPLETE	APPROVED		
108.	PHLF M52B	WELL	12/16/99	SJ14202	BARRIER 5 MONITORING WELL, M52B, PHLF (SUB D)			COMPLETE	APPROVED		
109.	PHLF M52B	WELL	12/16/99	SJ14203	BARRIER 5 MONITORING WELL, M52B, PHLF (SUB D) (DUP)			COMPLETE	APPROVED		
110.	PHLF M47B	WELL	03/02/00	SJ23080	BARRIER 4 MONITORING WELL M47B, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
111.	PHLF M47B	WELL	03/02/00	SJ23081	BARRIER 4 MONITORING WELL M47B, PHLF (SUB D) DUP			COMPLETE	APPROVED		
112.	PHLF M52B	WELL	03/08/00	SJ23283	BARRIER 5 MONITORING WELL M52B, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
113.	PHLF M52B	WELL	03/08/00	SJ23284	BARRIER 5 MONITORING WELL M52B, PHLF (SUB D SAMPLE) (DUP)			COMPLETE	APPROVED		
114.	PHLF EMP6	WELL	03/08/00	SJ23288	EVALUATION MONITORING WELL, EMP6, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
115.	PHLF M41A	WELL	03/10/00	SJ23426	BARRIER 4 ALLUVIAL WELL M41A, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
116.	PHLF M41A	WELL	03/10/00	SJ23427	BARRIER 4 ALLUVIAL WELL M41A, PHLF (SUB D SAMPLE) (DUP)			COMPLETE	APPROVED		
117.	PHLF M42A	WELL	03/13/00	SJ23511	BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
118.	PHLF M43A	WELL	03/13/00	SJ23512	BARRIER 4 ALLUVIAL WELL M43A, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
119.	PHLF M52B	WELL	06/06/00	SJ27379	BARRIER 5 MONITORING WELL M52B, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		
120.	PHLF M51A	WELL	06/07/00	SJ27465	BARRIER 5 MONITORING WELL M51A, PHLF (SUB D SAMPLE)			COMPLETE	APPROVED		

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LABORATORY DATA SYSTEM - Landfill Data : PHLF										10/06/05	Page 4
NO.	LOCATION	TYPE	DATE	LOG NO.	SAMPLE	DATA	DESCRIPTION	STATUS			
121.	PHLF EMP6	WELL	06/08/00	SJ27542			EVALUATION MW EMP6, PHLF (SUB D SAMPLE)	COMPLETE	APPROVED		
122.	PHLF M41A	WELL	06/12/00	SJ27635			BARRIER 4 ALLUVIAL WELL M41A, PHLF (SUB D SAMPLE)	COMPLETE	APPROVED		
123.	PHLF M43A	WELL	06/12/00	SJ27637			BARRIER 4 ALLUVIAL WELL M43A, PHLF (SUB D SAMPLE)	COMPLETE	APPROVED		
124.	PHLF M42A	WELL	06/12/00	SJ27642			BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUB D SAMPLE)	COMPLETE	APPROVED		
125.	PHLF M42A	WELL	06/12/00	SJ27643			BARRIER 4 ALLUVIAL WELL M42A, PHLF (SUB D SAMPLE) (DUP)	COMPLETE	APPROVED		
126.	PHLF M51A	WELL	09/01/00	SJ30879			BARRIER 5 MONITORING WELL, M51A, PHLF (SUB D SAMPLE)	COMPLETE	APPROVED		
127.	PHLF M52B	WELL	09/01/00	SJ30887			BARRIER 5 MONITORING WELL, M52B, PHLF (SUB D SAMPLE)	COMPLETE	APPROVED		
128.	PHLF M52B	WELL	09/01/00	SJ30888			BARRIER 5 MONITORING WELL, M52B, PHLF (SUB D SAMPLE) (DUP)	COMPLETE	APPROVED		
129.	PHLF EMP5	WELL	09/05/00	SJ30973			EVALUATION MONITORING WELL EMP5, PHLF (SUB D)	COMPLETE	APPROVED		
130.	PHLF M51A	WELL	12/04/00	SJ34354			BARRIER 5 MONITORING WELL M51A, PHLF (SUB D SAMPLE)	COMPLETE	APPROVED		
131.	PHLF M52B	WELL	12/05/00	SJ34399			BARRIER 5 MONITORING WELL M52B, PHLF (SUB D SAMPLE)	COMPLETE	APPROVED		
132.	PHLF M52B	WELL	12/05/00	SJ34400			BARRIER 5 MONITORING WELL M52B, PHLF (SUB D SAMPLE) (DUP)	COMPLETE	APPROVED		
133.	PHLF EMP6	WELL	12/08/00	SJ34602			EVALUATION MONITORING WELL EMP6, PHLF (SUB D SAMPLE)	COMPLETE	APPROVED		
134.	PHLF M51A	WELL	03/09/01	SJ43676			BARRIER 5 MONITORING WELL M51A, PHLF (SUB D SAMPLE)	COMPLETE	APPROVED		
135.	PHLF M52B	WELL	03/09/01	SJ43679			BARRIER 5 MONITORING WELL M52B, PHLF (SUB D SAMPLE)	COMPLETE	APPROVED		
136.	PHLF M52B	WELL	03/09/01	SJ43680			BARRIER 5 MONITORING WELL M52B, PHLF (SUB D SAMPLE) (DUP)	COMPLETE	APPROVED		
137.	PHLF M52B	WELL	06/05/01	SJ47182			BARRIER 5 MONITORING WELL M52B, PHLF (SUB D SAMPLE)	COMPLETE	APPROVED		
138.	PHLF M51A	WELL	06/13/01	SJ47688			BARRIER 5 MONITORING WELL M51A, PHLF (SUB D SAMPLE)	COMPLETE	APPROVED		
139.	PHLF M52B	WELL	09/05/01	SJ51430			BARRIER 5 BEDROCK WELL M52B, PHLF (SUB D SAMPLE)	COMPLETE	APPROVED		
140.	PHLF M52B	WELL	09/05/01	SJ51431			BARRIER 5 BEDROCK WELL M52B, PHLF (SUB D SAMPLE) (DUP)	COMPLETE	APPROVED		
141.	PHLF M51A	WELL	09/05/01	SJ51437			BARRIER 5 ALLUVIAL WELL M51A, PHLF (SUB D)	COMPLETE	APPROVED		
142.	PHLF M51A	WELL	12/03/01	SJ56636			BARRIER 5 ALLUVIAL WELL M51A, PHLF (SUB D SAMPLE)	COMPLETE	APPROVED		
143.	PHLF M52B	WELL	12/04/01	SJ56656			BARRIER 5 BEDROCK WELL M52B, PHLF (SUB D)	COMPLETE	APPROVED		
144.	PHLF EMP5	WELL	03/10/03	SJ83389			BARRIER 1 MONITORING WELL EMP 5, PHLF, (SUB D SAMPLE)	COMPLETE	APPROVED		
145.	PHLF M52B	WELL	03/01/04	SJ03245			BARRIER 5 WELL M52B, PHLF (SUB D)	COMPLETE	APPROVED		
146.	PHLF M42A	WELL	03/04/04	SJ03537			BARRIER 4 WELL M42A, PHLF (SUB D)	COMPLETE	APPROVED		
147.	PHLF M43A	WELL	03/04/04	SJ03538			BARRIER 4 WELL M43A, PHLF (SUB D)	COMPLETE	APPROVED		
148.	PHLF EMP4	WELL	03/05/04	SJ03611			EMP WELL EMP4, PHLF (SUB D)	COMPLETE	APPROVED		
149.	PHLF EMP6	WELL	03/10/04	SJ03894			EMP WELL EMP 6, PHLF (SUB D)	COMPLETE	APPROVED		
150.	PHLF EMP6	WELL	03/10/04	SJ03895			EMP WELL EMP 6, PHLF (SUB D) (DUP)	COMPLETE	APPROVED		
151.	PHLF EMP3	WELL	03/11/04	SJ03979			EMP WELL EMP3, PHLF (SUB D)	COMPLETE	APPROVED		
152.	PHLF M47B	WELL	03/12/04	SJ04042			BARRIER 4 WELL M47B, PHLF (SUB D)	COMPLETE	APPROVED		
153.	PHLF M47B	WELL	03/12/04	SJ04043			BARRIER 4 WELL M47B, PHLF (SUB D) (DUP)	COMPLETE	APPROVED		
154.	PHLF M24A	WELL	03/12/04	SJ04048			BARRIER 2 WELL M24A, PHLF (SUB D)	COMPLETE	APPROVED		
155.	PHLF M42A	WELL	07/09/04	SJ10375			BARRIER 4 WELL M42A, PHLF (SUB D)	COMPLETE	APPROVED		

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LABORATORY DATA SYSTEM - Landfill Data : PHLF										10/06/05	Page 1
DATE	LOG NO.	(206) TOTAL CYANIDE	(251) TOTAL SULFIDE	MG/L CN	MG/L S	TEST	RESULTS				
03/11/94	SJ73340	B-GR	< 0.01	< 0.1	< 0.1						
03/22/94	SJ73839	B-GR	< 0.01	< 0.1	< 0.1						
03/25/94	SJ74076	O-GR	< 0.01	< 0.1	< 0.1						
06/03/94	SJ77183	B-GR	< 0.01	< 0.1	< 0.1						
06/27/94	SJ78257	B-GR	< 0.01	< 0.1	< 0.1						
06/28/94	SJ78316	B-GR	< 0.01	< 0.1	< 0.1						
09/09/94	SJ81427	O-GR	< 0.01	< 0.1	< 0.1						
09/27/94	SJ82154	B-GR	< 0.01	< 0.1	< 0.1						
09/28/94	SJ82272	B-GR	< 0.01	< 0.1	< 0.1						
12/29/94	SJ86862	D-GR	< 0.002	< 0.1	< 0.1						
12/29/94	SJ86863	D-GR	< 0.002	< 0.1	< 0.1						
03/01/95	SJ92681	D-GR	< 0.002	< 0.1	< 0.1						
03/06/95	SJ92852	D-GR	< 0.003	< 0.1	< 0.1						
03/06/95	SJ92853	D-GR	< 0.003	< 0.1	< 0.1						
03/06/95	SJ92854	D-GR	< 0.002	< 0.1	< 0.1						
03/17/95	SJ93483	D-GR	< 0.002	< 0.1	< 0.1						
03/17/95	SJ93484	D-GR	< 0.002	< 0.1	< 0.1						
03/17/95	SJ93485	D-GR	< 0.002	< 0.1	< 0.1						
06/21/95	SJ97718	D-GR	< 0.002	< 0.1	< 0.1						
06/21/95	SJ97719	D-GR	< 0.002	< 0.1	< 0.1						
06/21/95	SJ97720	D-GR	< 0.002	< 0.1	< 0.1						
09/13/95	SJ01356	D-GR	< 0.002	< 0.1	< 0.1						
09/13/95	SJ01364	D-GR	< 0.002	< 0.1	< 0.1						
09/13/95	SJ01365	D-GR	< 0.002	< 0.1	< 0.1						
12/11/95	SJ05128	D-GR	< 0.002	< 0.1	< 0.1						
12/11/95	SJ05129	D-GR	< 0.002	< 0.1	< 0.1						
09/02/97	SJ40115	D-GR	< 0.002	< 0.1	< 0.1						
09/02/97	SJ40116	D-GR	< 0.002	< 0.1	< 0.1						
09/02/97	SJ40120	D-GR	< 0.002	< 0.1	< 0.1						
09/02/97	SJ40121	D-GR	< 0.002	< 0.1	< 0.1						
09/03/97	SJ40160	D-GR	< 0.002	< 0.1	< 0.1						
09/04/97	SJ40227	D-GR	< 0.002	< 0.1	< 0.1						
09/04/97	SJ40228	D-GR	< 0.002	< 0.1	< 0.1						
09/18/97	SJ40750	D-GR	< 0.01	< 0.1	< 0.1						
09/18/97	SJ40751	D-GR	< 0.01	< 0.1	< 0.1						
09/18/97	SJ40755	D-GR	< 0.01	< 0.1	< 0.1						
09/18/97	SJ40756	D-GR	< 0.01	< 0.1	< 0.1						
09/30/97	SJ41139	D-GR	< 0.01	< 5.0	< 0.1						
09/30/97	SJ41140	D-GR	< 0.01	< 4.0	< 0.1						
10/01/97	SJ41193	D-GR	< 0.01	< 0.1	< 0.1						

Footnote(s) : A-AVERAGE OF DUPS, B-DUPLICATE SPIKE, C-CHECK NOTES TO USER, D-AMENDED TEST RESULT

LABORATORY DATA SYSTEM - Landfill Data : PHLF										10/06/05	Page 2
***** S A M P L E T E S T R E S U L T S *****										*****	*****
DATE	LOG NO.	(206)		(251)		TOTAL		TOTAL		MG/L S	
		CYANIDE	MG/L CN	SULFIDE	MG/L S	CYANIDE	MG/L S				
10/01/97	SJ41194	D-GR	< 0.01	< 0.1							
12/11/97	SJ43712	D-GR	< 0.002	< 1.4							
12/11/97	SJ43713	D-GR	< 0.002	0.7							
12/19/97	SJ44014	D-GR	< 0.002	< 0.1							
03/06/98	SJ52359	D-GR	< 0.002	< 0.1							
03/25/98	SJ53111	D-GR	< 0.002	< 0.1							
06/01/98	SJ55818	D-GR	< 0.002	< 0.1							
06/08/98	SJ56098	D-GR	< 0.002	< 0.1							
09/09/98	SJ59708	D-GR	< 0.005	< 0.1							
09/09/98	SJ59709	D-GR	< 0.005	< 0.1							
09/09/98	SJ59713	D-GR	< 0.005	< 0.1							
09/09/98	SJ59714	D-GR	< 0.005	< 0.1							
09/10/98	SJ59811	D-GR	< 0.005	< 0.1							
09/10/98	SJ59812	D-GR	< 0.005	< 0.1							
09/10/98	SJ59816	D-GR	< 0.005	< 0.1							
09/10/98	SJ59817	D-GR	< 0.005	< 0.1							
09/11/98	SJ59855	D-GR	< 0.005	< 0.1							
09/14/98	SJ59898	D-GR	< 0.005	< 0.1							
09/14/98	SJ59899	D-GR	< 0.005	< 0.1							
06/07/99	SJ06705	D-GR	< 0.005	< 0.1							
06/07/99	SJ06706	D-GR	< 0.005	< 0.1							
06/08/99	SJ06788	D-GR	< 0.005	< 0.1							
09/01/99	SJ09942	D-GR	< 0.005	< 0.1							
09/01/99	SJ09943	D-GR	< 0.005	< 0.1							
09/02/99	SJ09990	D-GR	< 0.005	< 0.1							
09/02/99	SJ09991	D-GR	< 0.005	< 0.1							
09/03/99	SJ10037	O-GR	< 0.005	< 0.1							
09/03/99	SJ10038	O-GR	< 0.005	< 0.1							
09/03/99	SJ10046	D-GR	< 0.005	< 0.1							
09/16/99	SJ10472	D-GR	< 0.005	< 0.1							
09/16/99	SJ10473	D-GR	< 0.005	< 0.1							
09/16/99	SJ10478	D-GR	< 0.005	< 0.1							
09/17/99	SJ10524	D-GR	< 0.005	< 0.1							
09/17/99	SJ10525	D-GR	< 0.005	< 0.1							
09/17/99	SJ10537	D-GR	< 0.005	< 0.1							
09/17/99	SJ10538	D-GR	< 0.005	< 0.1							
09/20/99	SJ10581	D-GR	< 0.005	< 0.1							
09/06/00	SJ31022	D-GR	< 0.005	< 0.1							
09/07/00	SJ31064	D-GR	< 0.005	< 0.1							
09/08/00	SJ31111	D-GR	< 0.005	< 0.1							

LABORATORY DATA SYSTEM - Landfill Data : PHLF										10/06/05	Page 3
*****										*****	
TEST RESULTS										*****	
*****										*****	
S A M P L E										*****	
TOTAL										*****	
(251)										*****	
SULFIDE										*****	
MG/L S											
DATE	LOG NO.	TOTAL CYANIDE	TOTAL SULFIDE								
		MG/L CN	MG/L S								
09/08/00	SJ31137 D-GR	< 0.005	< 0.1								
09/08/00	SJ31138 D-GR	< 0.005	< 0.1								
09/11/00	SJ31170 D-GR	< 0.005	< 0.1								
09/12/00	SJ31233 D-GR	< 0.005	< 0.1								
03/03/03	SJ83039 D-GR	< 0.005	< 0.1								
03/03/03	SJ83040 D-GR	< 0.005	< 0.1								
03/06/03	SJ83252 D-GR	< 0.005	< 0.1								
03/07/03	SJ83319 D-GR	< 0.005	< 0.1								
03/11/03	SJ83455 D-GR	< 0.005	< 0.1								
03/12/03	SJ83567 D-GR	< 0.005	< 0.1								
03/17/03	SJ83819 D-GR	< 0.005	< 0.1								
03/02/04	SJ03343 D-GR	< 0.005	< 0.1								
03/02/04	SJ03346 D-GR	< 0.005	< 0.1								
03/02/04	SJ03347 D-GR	< 0.005	< 0.1								
03/05/04	SJ03615 D-GR	< 0.005	< 0.1								
03/05/04	SJ03616 D-GR	< 0.005	< 0.1								
03/08/04	SJ03662 D-GR	< 0.005	< 0.1								
03/08/04	SJ03663 D-GR	< 0.005	< 0.1								
03/09/04	SJ03776 D-GR	< 0.005	< 0.1								
03/09/04	SJ03777 D-GR	< 0.005	< 0.1								
03/11/04	SJ03990 D-GR	< 0.005	< 0.1								
03/11/04	SJ03991 D-GR	< 0.005	< 0.1								
Maximum		0.0100	5.0000								
Mean		< 0.0049	< 0.2049								
Median		< 0.0050	< 0.1000								
Minimum		< 0.0020	< 0.1000								
Std Dev		< 0.0026	< 0.6305								
Count		102.0000	102.0000								

Footnote(s): A-AVERAGE OF DUPS, B-DUPLICATE SPIKE, C-CHECK NOTES TO USER, D-AMENDED TEST RESULT

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LABORATORY DATA SYSTEM - Landfill Data : PHLF										10/06/05	Page 1
DATE	LOG NO.	(206) TOTAL CYANIDE	(251) TOTAL SULFIDE	MG/L CN	MG/L S	TEST	RESULTS				
03/23/94	SJ73925	B-GR									
03/23/94	SJ73926	B-GR	< 0.01		< 0.1						
06/23/94	SJ78116	B-GR	< 0.01		< 0.1						
06/23/94	SJ78117	B-GR	< 0.01		< 0.1						
09/26/94	SJ82122	B-GR	< 0.01		< 0.1						
09/26/94	SJ82123	B-GR	< 0.01		< 0.1						
03/06/95	SJ92866	D-GR	< 0.002		< 0.1						
03/06/95	SJ92867	D-GR	< 0.002		< 0.1						
07/07/95	SJ98350	D-GR	< 0.002		< 0.1						
07/07/95	SJ98351	O-GR	< 0.002		< 0.1						
07/07/95	SJ98352	O-GR	< 0.002		< 0.1						
07/07/95	SJ98354	D-GR	< 0.002		< 0.1						
09/19/95	SJ01613	D-GR	< 0.002		< 0.1						
12/12/95	SJ05176	O-GR	< 0.002		< 0.1						
12/21/95	SJ05568	D-GR	< 0.002		< 0.1						
12/21/95	SJ05578	O-GR	< 0.002		< 0.1						
03/15/96	SJ13374	D-GR	< 0.002		< 0.1						
03/20/96	SJ13553	D-GR	< 0.002		< 0.1						
03/20/96	SJ13554	D-GR	< 0.002		< 0.1						
06/05/96	SJ17740	D-GR	< 0.002		< 0.1						
06/05/96	SJ17749	D-GR	< 0.002		< 0.1						
06/05/96	SJ17750	D-GR	< 0.002		< 0.1						
09/04/96	SJ21318	D-GR	< 0.002		< 0.1						
09/10/96	SJ21538	D-GR	< 0.002		< 0.1						
09/11/96	SJ21637	D-GR	< 0.002		< 0.1						
12/02/96	SJ24710	D-GR	< 0.002		< 0.1						
12/03/96	SJ24799	D-GR	< 0.002		< 0.1						
12/04/96	SJ24859	D-GR	< 0.003		< 0.1						
03/20/97	SJ33054	D-GR	< 0.002								
03/20/97	SJ33055	D-GR	< 0.002								
03/20/97	SJ33068	D-GR	< 0.002								
03/20/97	SJ33069	D-GR	< 0.002								
06/11/97	SJ36370	D-GR	< 0.002								
06/11/97	SJ36371	D-GR	< 0.002								
06/11/97	SJ36375	D-GR	< 0.002								
06/11/97	SJ36376	D-GR	< 0.002								
09/04/97	SJ40223	D-GR	< 0.002		< 0.1						
09/05/97	SJ40261	D-GR	< 0.002		< 0.1						
09/05/97	SJ40262	D-GR	< 0.002		< 0.1						
09/08/97	SJ40288	D-GR	< 0.002								

Footnote(s) : A-AVERAGE OF DUPS, B-DUPLICATE SPIKE, C-CHECK NOTES TO USER, D-AMENDED TEST RESULT

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DATE	LOG NO.	(206) TOTAL CYANIDE	(251) TOTAL SULFIDE	MG/L S	MG/L CN	TEST	RESULTS
09/08/97	SJ40289	D-GR	< 0.002				
09/08/97	SJ40293	D-GR	< 0.002				
09/08/97	SJ40294	D-GR	< 0.002				
09/10/97	SJ40401	D-GR	< 0.01	5.0			
12/10/97	SJ43620	D-GR	< 0.002				
12/10/97	SJ43621	D-GR	< 0.002				
12/10/97	SJ43625	D-GR	< 0.002				
12/10/97	SJ43626	D-GR	< 0.002				
03/04/98	SJ52265	D-GR	< 0.002				
03/04/98	SJ52267	D-GR	< 0.002				
03/04/98	SJ52271	D-GR	< 0.002				
03/04/98	SJ52272	D-GR	< 0.002				
06/02/98	SJ55859	D-GR	< 0.002				
06/02/98	SJ55860	D-GR	< 0.002				
06/02/98	SJ55867	D-GR	< 0.002				
06/02/98	SJ55868	D-GR	< 0.002				
09/03/98	SJ59580	D-GR	< 0.005	< 0.1			
09/03/98	SJ59581	D-GR	< 0.005	< 0.1			
09/08/98	SJ59670	D-GR	< 0.005	< 0.9			
09/08/98	SJ59674	D-GR	< 0.005	< 0.1			
09/08/98	SJ59675	D-GR	< 0.005	< 0.1			
09/14/98	SJ59902	D-GR	< 0.005	< 0.1			
09/15/98	SJ59940	D-GR	< 0.005				
09/15/98	SJ59941	D-GR	< 0.005				
09/15/98	SJ59945	D-GR	< 0.005				
09/15/98	SJ59946	D-GR	< 0.005				
12/15/98	SJ63796	D-GR	< 0.005				
12/15/98	SJ63797	D-GR	< 0.005	< 0.1			
12/16/98	SJ63898	D-GR	< 0.005				
12/16/98	SJ63899	D-GR	< 0.005				
03/02/99	SJ02571	D-GR	< 0.005				
03/02/99	SJ02572	D-GR	< 0.005				
03/02/99	SJ02583	D-GR	< 0.005				
03/02/99	SJ02584	D-GR	< 0.005				
03/04/99	SJ02801	D-GR	< 0.005	< 0.1			
03/04/99	SJ02802	D-GR	< 0.005	< 0.1			
06/02/99	SJ06487	O-GR	< 0.005	< 0.1			
06/08/99	SJ06782	D-GR	< 0.005	< 0.1			
06/08/99	SJ06783	D-GR	< 0.005	< 0.1			
06/08/99	SJ06789	D-GR	< 0.005	< 0.1			

Footnote(s): A-AVERAGE OF DUPS, B-DUPLICATE SPIKE, C-CHECK NOTES TO USER, D-AMENDED TEST RESULT

LABORATORY DATA SYSTEM - Landfill Data : PHLF										10/06/05	Page 3
DATE	LOG NO.	(206) TOTAL CYANIDE MG/L CN	(251) TOTAL SULFIDE MG/L S	TEST	R E S U L T S						
06/09/99	SJ06822 D-GR	< 0.011									
06/09/99	SJ06823 D-GR	< 0.005									
06/09/99	SJ06842 D-GR	< 0.005									
06/09/99	SJ06843 D-GR	< 0.005									
06/10/99	SJ06879 D-GR	< 0.011	0.1								
09/02/99	SJ09994 D-GR	< 0.005	< 0.1								
09/07/99	SJ10079 D-GR	< 0.005	< 0.1								
09/07/99	SJ10093 D-GR	< 0.005	< 0.1								
09/07/99	SJ10094 D-GR	< 0.005	< 0.1								
09/13/99	SJ10299 D-GR	< 0.005	0.5								
09/13/99	SJ10312 D-GR	< 0.005	< 0.1								
09/13/99	SJ10313 D-GR	< 0.005	< 0.1								
09/14/99	SJ10328 D-GR	< 0.005	< 0.1								
09/14/99	SJ10341 D-GR	< 0.005	< 0.1								
09/14/99	SJ10342 D-GR	< 0.005	< 0.1								
09/15/99	SJ10398 D-GR	< 0.005	< 0.1								
09/16/99	SJ10477 D-GR	< 0.005	< 0.1								
09/20/99	SJ10599 D-GR	< 0.005	< 0.1								
12/07/99	SJ13858 D-GR	< 0.005	< 0.1								
12/07/99	SJ13859 D-GR	< 0.005	< 0.1								
12/07/99	SJ13860 D-GR	< 0.005	< 0.1								
12/09/99	SJ13944 D-GR	< 0.005	< 0.1								
12/09/99	SJ13945 D-GR	< 0.005	< 0.1								
12/10/99	SJ13989 D-GR	< 0.005									
12/10/99	SJ13990 D-GR	< 0.005									
12/10/99	SJ14008 D-GR	< 0.005									
12/10/99	SJ14009 D-GR	< 0.005									
12/16/99	SJ14202 D-GR	< 0.005	< 0.1								
12/16/99	SJ14203 D-GR	< 0.005	< 0.1								
03/02/00	SJ23080 D-GR	< 0.005	< 0.1								
03/02/00	SJ23081 D-GR	< 0.005	< 0.1								
03/08/00	SJ23283 D-GR	< 0.005	< 0.1								
03/08/00	SJ23284 D-GR	< 0.005	< 0.1								
03/08/00	SJ23288 D-GR	< 0.005	< 0.1								
03/10/00	SJ23426 D-GR	< 0.005									
03/10/00	SJ23427 D-GR	< 0.005									
03/13/00	SJ23511 D-GR	< 0.005									
03/13/00	SJ23512 D-GR	< 0.005									
06/06/00	SJ27379 D-GR	< 0.005	< 0.1								
06/07/00	SJ27465 D-GR	< 0.005	0.3								

Footnote(s): A-AVERAGE OF DUPS, B-DUPLICATE SPIKE, C-CHECK NOTES TO USER, D-AMENDED TEST RESULT

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LABORATORY DATA SYSTEM - Landfill Data : PHLF										10/06/05	Page 4
DATE	LOG NO.	(206) TOTAL CYANIDE	(251) TOTAL SULFIDE	MG/L CN	MG/L S	TEST	SAMPLE	RESULTS			
06/08/00	SJ27542	D-GR	< 0.005	< 0.1							
06/12/00	SJ27635	D-GR	< 0.005								
06/12/00	SJ27637	D-GR	< 0.005								
06/12/00	SJ27642	D-GR	< 0.005								
06/12/00	SJ27643	D-GR	< 0.005								
09/01/00	SJ30879	D-GR	< 0.005	< 0.1							
09/01/00	SJ30887	D-GR	< 0.005	< 0.1							
09/01/00	SJ30888	D-GR	< 0.005	< 0.1							
09/05/00	SJ30973	D-GR	< 0.005	< 0.1							
12/04/00	SJ34354	D-GR	< 0.005	< 0.1							
12/05/00	SJ34399	D-GR	< 0.005	< 0.1							
12/05/00	SJ34400	D-GR	< 0.005	< 0.1							
12/08/00	SJ34602	D-GR	< 0.005	< 0.1							
03/09/01	SJ43676	D-GR	< 0.005	< 0.1							
03/09/01	SJ43679	D-GR	< 0.005	< 0.1							
03/09/01	SJ43680	D-GR	< 0.005	< 0.1							
06/05/01	SJ47182	D-GR	< 0.005	< 0.3							
06/13/01	SJ47688	D-GR	< 0.005	< 0.1							
09/05/01	SJ51430	D-GR	0.007	0.5							
09/05/01	SJ51431	D-GR	0.008	0.3							
09/05/01	SJ51437	D-GR	0.012	< 0.1							
12/03/01	SJ56636	D-GR	< 0.005	< 0.1							
12/04/01	SJ56656	D-GR	< 0.005	< 0.1							
03/10/03	SJ83389	D-GR	< 0.005	< 0.1							
03/01/04	SJ03245	D-GR	< 0.005	0.4							
03/04/04	SJ03537	D-GR	< 0.005	< 0.1							
03/04/04	SJ03538	D-GR	< 0.005	< 0.1							
03/05/04	SJ03611	D-GR	< 0.005	< 0.1							
03/10/04	SJ03894	D-GR	< 0.005	< 0.1							
03/10/04	SJ03895	D-GR	< 0.005	< 0.1							
03/11/04	SJ03979	D-GR	< 0.005	< 0.1							
03/12/04	SJ04042	D-GR	< 0.005	< 0.1							
03/12/04	SJ04043	D-GR	< 0.005	< 0.1							
03/12/04	SJ04048	D-GR	< 0.005	< 0.1							
07/09/04	SJ10375	D-GR	0	< 0.1							
Maximum			0.0120	5.0000							
Mean		< 0.0044	< 0.1712								
Median		< 0.0050	< 0.1000								
Minimum		< 0.0020	< 0.1000								
Std Dev		< 0.0021	< 0.4892								
Count		154.0000	104.0000								

Footnote(s): A-AVERAGE OF DUPS, B-DUPLICATE SPIKE, C-CHECK NOTES TO USER, D-AMENDED TEST RESULT